



## Appendix 4.1

### ALTERNATIVE SITES ASSESSMENT

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# Alternative Site Assessment Hillingdon Water Sports Facility and Activity Centre

November 2025



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# 1. Introduction

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- 1.1 This Alternative Sites Assessment (ASA) has been prepared by the London Borough of Hillingdon (LB Hillingdon) (Capital Works Department) ('the Applicant'). The Applicant is seeking planning permission for a new water sports facility and activity centre which will be known as The Hillingdon Water Sports and Facilities Centre (HWSFAC) ('the Proposed Development').
- 1.2 This Planning Statement has been submitted as part of a wider planning application which is currently being determined by LBH under planning application ref. 2382/APP/2023/2906 ('the Planning Application'). An ASA was originally submitted as part of the Planning Application.
- 1.3 Since the submission of the Planning Application in October 2023, a series of statutory consultees comments have been received. As a result of these comments, the scheme has been reduced in size. Prior to the design being progressed, the Alternative Sites Assessment was revisited to review whether there are alternative sites available to accommodate a scheme which is reduced in scale.
- 1.4 The Proposed Development will provide a replacement facility of the former Hillingdon Outdoor Activity Centre (HOAC) ('the former HOAC facility') which is located on Dews Lane, Harefield, UB9 6JN. The charity which previously operated at the former HOAC facility was the Colne Valley Youth & Community Association ('the Association') (Charity number: 1012242). The Association is a Youth Educational Charity which provides outdoor and environmental education for the whole community, but with priority given to young people, particularly those who are disadvantaged or disabled. LB Hillingdon owns the former HOAC facility, which the Association currently manages under a partnership agreement.
- 1.5 The former HOAC facility is located on the direct route of High Speed Two (HS2), the new high speed rail line connecting London to Birmingham. The High-Speed Rail (London – West Midlands) Act 2017 ('the HS2 Act') is the legislation which authorised the construction and operation of the first phase of the HS2 railway. The HS2 Act was passed in February 2017 and grants HS2 Ltd the necessary powers to build and maintain the railway line between London and the West Midlands.
- 1.6 The HS2 Act also granted powers to HS2 Ltd to acquire the necessary land and rights for land for the project. The Dews Lane site was subject to a Compulsory Purchase Order (CPO) to facilitate the new HS2 route. The new HS2 route prevents the former HOAC facility from continuing to operate in this location, as the Colne Valley viaduct requires a safety buffer zone either side of the railway. The former HOAC facility has therefore been closed since October 2022.
- 1.7 HS2 Ltd have taken full possession of the former HOAC facility for the construction phase. Once the construction phase is complete, HS2 Ltd will hand back the majority of the former HOAC facility to LB Hillingdon. However, a strip of land through the middle of the site will continue to be used by HS2 Ltd to access the rail line, for maintenance and safety purposes.
- 1.8 A legal agreement between HS2 Ltd, the Secretary of State for Transport and LB Hillingdon was agreed in August 2017. The Agreement states that LB Hillingdon will use reasonable endeavours, working together with HS2 Ltd to within three years from the date of the agreement (this has since been extended to January 2026), to design and implement a scheme for the relocation of the former HOAC facility to Denham Quarry (also known as Summerleaze Lake and New Denham Quarry) or other such

suitable site or sites to be agreed with HS2 Ltd, the Association and the relevant local authorities. The agreement states that the cost should be no greater than £26.5 million.

- 1.9 For reasons that are set out in this ASA, Denham Quarry (also known as Summerlease Lake and New Denham Quarry) is not suitable for the relocation of the former HOAC facility. The Applicant is therefore looking to relocate to another site. The responsibility for finding a new alternative site for the Proposed Development falls to the Applicant. This ASA assesses the alternative sites that have been considered. The purpose of this document is to ascertain which site is the most suitable for the Proposed Development and to demonstrate that all reasonably available and suitable alternatives have been properly considered.
- 1.10 The purpose of the ASA is not to justify the suitability of the development proposed as part of the Planning Application. This is assessed from a planning and environmental perspective in detail within the Planning Statement, Environmental Statement and Design and Access Statement which accompany the Planning Application.
- 1.11 There is no formally prescribed process or methodology for undertaking an ASA and the process should be adapted to the characteristics of different projects. The method used in this assessment reflects the planning policy requirements set out in Section 2 and the specific operational and locational needs of the Proposed Facility.
- 1.12 Regard has also been had to Surrey County Council's (SCC) Alternative Site Assessment Guidance (May 2021) which seeks to assist Applicants and Planning Officers in understanding the purpose of and process for undertaking an ASA to support a planning application. Although the Proposed Development will not be located within the administrative boundary of SCC, the guidance is useful in providing context to the requirement of an ASA and the proposed methodology. A copy of SCC's Alternative Site Assessment guidance can be found at **Appendix 1**.
- 1.13 Consideration has been had to the HS2 Lake Options Report<sup>1</sup> (2015) ('the HS2 Report'). The HS2 Report was prepared by HS2 Ltd to assess several potential new locations for a facility which would replace the former HOAC facility. The report identified a list of lakes which were assessed against a set of recreational criteria which were required to meet the needs of the former operation. The HS2 Report has been taken into consideration in the preparation of this ASA, however it is somewhat out-of-date given that it was published over nine years ago.
- 1.14 One of the key activities at the former HOAC facility, which is to be re-provided at the Proposed Development is sailing. This ASA draws upon sailing expertise which is set out in the Sailing Specific Requirements Report (October 2024) prepared by Peter Bentley Limited, a member of the Royal Yachting Association (RYA) and expert in the development of sailing facilities throughout the country. The Report assesses the sailing suitability of a number of lakes which have also been considered in this ASA. A copy of the Report can be found at **Appendix 2**.
- 1.15 The ASA is supported by the following appendices:
- **Appendix 1: SCC Alternative Site Assessment Guidance (May 2021)**
  - **Appendix 2: Sailing Suitability Requirements Report prepared by Peter Bentley Limited (August 2025)**

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<sup>1</sup> HS2, 2015. HOAC Lake Options Report. Document Number: C252-ETM-EV-REP-020-0000075 P04

- Appendix 3: Schedule of Accommodation (Existing and Proposed)
- Appendix 4: Copies of former HOAC facility school programmes
- Appendix 5: Maps of former HOAC facility users (2015)
- Appendix 6: Map of 20-kilometre search area
- Appendix 7: Noise and Air Quality Assessment of longlist sites
- Appendix 8: Map of lakes within 20-kilometre search area
- Appendix 9: Image of Penton Hook Marina
- Appendix 10: Bathymetric Survey of Broadwater Lake
- Appendix 11: Water Quality Survey of Broadwater Lake (LBH)
- Appendix 12: Bathymetric Survey of Ruislip Lido
- Appendix 13: Ruislip Lido Preliminary Explosive Ordnance Risk Assessment (January 2025)
- Appendix 14: Ruislip Lido Stage II Ground Investigation Survey (March 2025)
- Appendix 15: Secretary of State Letter regarding Denham Quarry (dated 18<sup>th</sup> October 2016)
- Appendix 16: Proposed Restoration Plans at New Denham Quarry

1.16 The ASA broadly follows the key steps outlined in **Figure 1**.

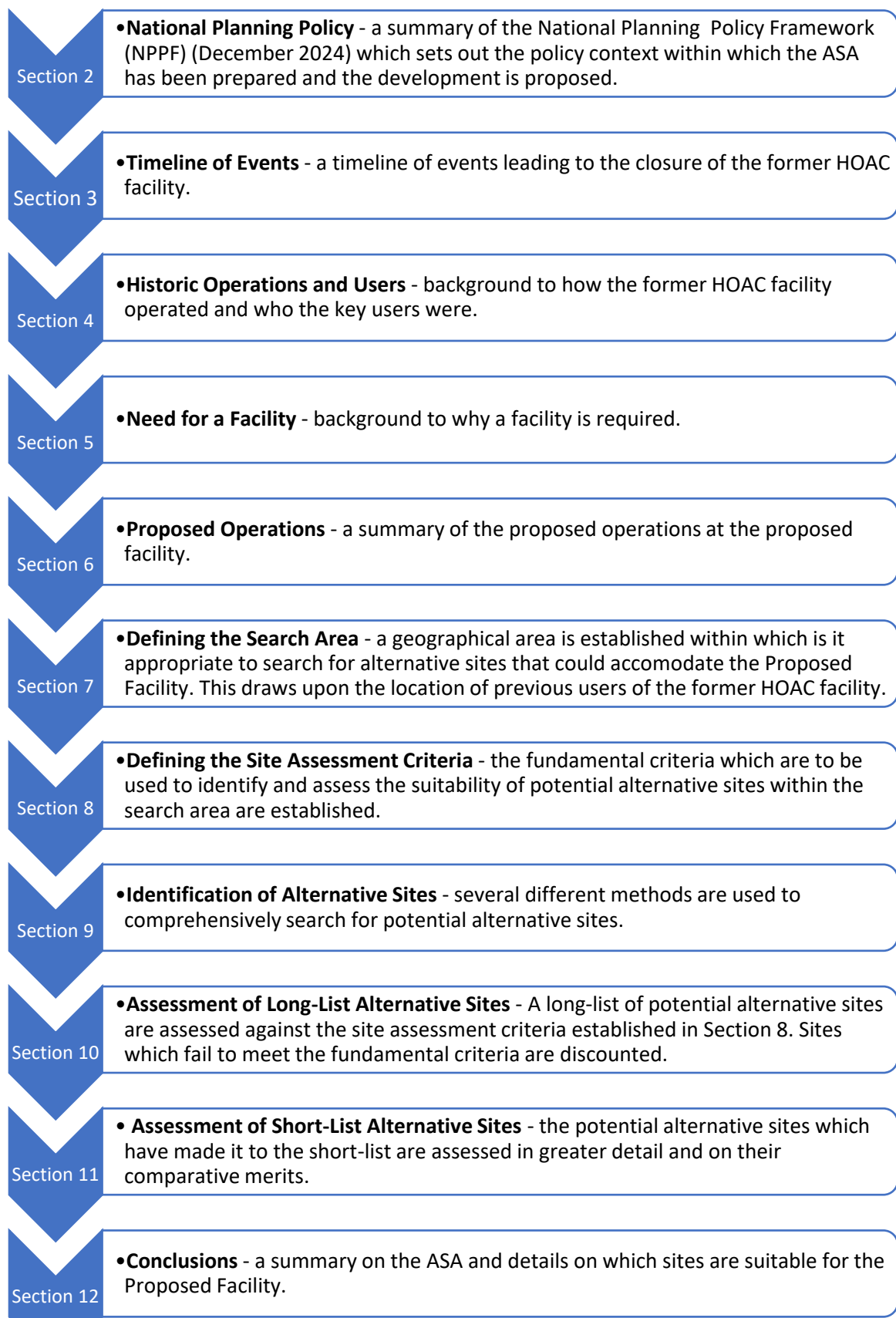


Figure 1: Key Steps of ASA

## 2. National Planning Policy

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- 2.1 This section of ASA sets out the relevant parts of the National Planning Policy Framework (NPPF) (December 2024), which sets out the policy context within which the ASA has been prepared and the development is proposed.
- 2.2 The NPPF (December 2024) is a national planning policy document that outlines the Government's planning policies for England and how they are expected to be applied. It sets the framework for local planning authorities to develop their local and neighbourhood plans, ensuring that they are consistent with the Government's vision for sustainable development.
- 2.3 Paragraph 193 of the NPPF states that when determining planning applications, local planning authorities should apply the following principles:
- (a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
  - (b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
  - (c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
  - (d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate".*
- 2.4 The NPPF is clear that if the proposed development has an adverse effect on protected sites, a Site of Special Scientific Interest (SSSI), then it must be demonstrated that there are no reasonable alternatives with a lesser environmental impact. The NPPF also requires demonstrable need to be demonstrated before development on Grey Belt land can be treated as appropriate development in policy terms and, where development is inappropriate, very special circumstances need to be demonstrated before planning permission is granted. The availability of alternative sites on which a proposed development could be developed is material to the issue of the need for the development and the weight to be accorded to that need.



### 3. Timeline of Events

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- 3.1 A timeline of events leading to the closure of the former HOAC facility is set out below.
- 3.2 **November 2013** – The High Speed Rail (London to West Midlands) Bill ('HS2 Bill'), was published to the House of Commons. The Bill granted the government the powers to construct and operate Phase 1 of the HS2 network, linking London to the West Midlands. Construction was due to start in 2017, with the first services expected to start running in 2026. The proposed HS2 route dissected the former HOAC facility. HS2 Ltd.'s original position was that the former HOAC facility might be able to continue in use during and after construction of the HS2 line, but the Association were adamant that this would not be feasible as some of its coaching and camping activities require tranquillity.
- 3.3 The HS2 Bill, is a hybrid bill. This means that whilst it is a public bill, it contains provisions which adversely affect the private interests of certain individuals and organisations. Procedurally, this means that for most purposes it proceeds as a public bill, but during certain stages of its passage it is treated in the similar way as a private bill. The hybrid bill procedure enables persons whose property interests are directly and specifically affected by the provisions of the bill, and also (as a matter of discretion) bodies and individuals concerned on behalf of community interests, to deposit a petition against the bill and be heard in public proceedings in a Select Committee.
- 3.4 **November 2013** – The HS2 Phase One Environmental Statement was published. This concluded that during the construction of HS2, users of the former HOAC facility would experience significant visual and noise effects affecting amenity which would therefore make it unlikely that it could operate during the five-year construction period. The document also reported that the closure of the former HOAC facility for five years could result in a loss of users, resulting in an effect on the facilities long-term viability.
- 3.5 **April 2014** – The HS2 Bill was committed to a Select Committee following the agreement of a motion in the House of Commons on 29th April 2014. During proceedings in the Select Committee, five sets of additional provisions were introduced. Additional provisions are significant changes which are likely to lead to a further round of petitions. In the House of Commons, the changes were either initiated by the Government or requested by petitioners. The Additional Provisions were accepted by the Select Committee and included in the HS2 Bill.
- 3.6 **May 2014** – A petition against the HS2 Bill was submitted on behalf of the Association. The petition objected to the HS2 Bill on the basis that it would result in a 13-metre-high viaduct which would run directly across the centre campsite, woodland and lake. HS2 Ltd would require the former HOAC facility and car park, making continued operation of the facility impossible. It was made clear that once HS2 was completed, the scale of environmental degradation, both at the centre of the site and the surrounding countryside, combined with the train noise, would make the centre's work with young people not viable. The petition requested that if a tunnel or altering the HS2 route is not feasible, at the nominated undertaker's expense, the former HOAC facility is relocated to another lake in the Colne Valley Park. The petition reported that only one suitable site had been identified, Broadwater Lake.
- 3.7 **March 2015** – The House of Commons Select Committee's First Special Report of Session was published. The following was reported in relation to the former HOAC facility at Dews Lane:

*“...We want a push now, toward a satisfactory compromise for HOAC, including a possible staged move. The Committee would like to see HOAC carry on its activities in one place or another but recognises the difficulty of staying on at the current site”.*

- 3.8 **February 2016** – The House of Commons Select Committee’s Second Special Report of Session was published. The following was reported in relation to the former HOAC facility at Dews Lane:

*“HOAC is a sailing and outdoor activities centre situated on Harefield No. 2 Lake...the proposed HS2 viaduct crosses the lake. Construction of the viaduct will take place from a site immediately adjacent to its premises. We heard a great deal about the value of this amenity, which is used by 40,000 people a year and has created the equivalent of 30 jobs. There was wide support for the work it undertakes for children, including disadvantaged children. There is also a rowing club”.*

- 3.9 The Second Special Report also identified an alternative location for the former HOAC facility – a gravel extraction facility, known as Denham Quarry (also known as Summerleaze Lake and New Denham Quarry). It was noted that the alternative location would not initially provide the same area of water as the current facility, but there was an option to extend the lake to an area of a similar size.
- 3.10 **March 2016** – HS2 Ltd.’s response to the Select Committee’s Second Special Report was published. The response acknowledged that the Select Committee wished to see the proposal for the former HOAC facility to be relocated to the New Denham Quarry site, come to fruition. The Promoter recognised that although this is not the most economic course of action, they understand that this is an important community asset for Hillingdon and the surrounding area. The Promoter advised that they continue to progress work to relocate this facility, however relocation cannot be at any cost and needs to balance the needs of the community against the need to protect the public purse.
- 3.11 **March 2016** – The HS2 Bill was introduced to the House of Lords and a Select Committee was formed.
- 3.12 **June 2016** – A planning application was submitted to Buckinghamshire County Council (BCC) for the extension of existing sand gravel extraction and restoration for relocation of Hillingdon Outdoor Activities Centre (ref. CM/22/16) at Denham Quarry (also known as Summerleaze Lake and New Denham Quarry). The proposed lake size was 10 hectares, which was the size requested by the Association at the time of submission.
- 3.13 **October 2016** – The Secretary of State issued a letter advising that as the estimated cost of the relocation to Denham Quarry (also known as Summerleaze Lake and New Denham Quarry) had increased to £55,000,000, the proposed relocation of the former HOAC facility could no longer take place. The letter states that LB Hillingdon have also advised that the £54,600 per annum grant for the Association will cease if the Association move out of their administrative boundary. It was also reported that Buckinghamshire County Council and South Buckinghamshire District Council have been clear that they will not replace this funding if the Proposed Development were to be located within their administrative boundary.
- 3.14 **October 2016** – A letter was issued to the Secretary of State on behalf of the Association by the Chair of Colne Valley Youth and Community Association. The letter expressed the Association’s disappointment that the relocation to New Denham Quarry could no longer take place. The letter confirmed that the former HOAC facility would stop operating before HS2 construction works commence, so that staff contracts can be terminated, future bookings can be cancelled, and members can be made aware.

- 3.15 **December 2016** – The House of Lords Select Committee First Special Report of Session was published. It was reported that one of the known compensation payments is £26,500,000 for the former HOAC facility.
- 3.16 This report also states that the viaduct will have an effect on water sports by causing air turbulence on windy days and that the high-speed trains may hit large birds. It reported that for most residents and visitors, the biggest impact will be noise and visual impact of the viaduct and the high-speed trains crossing it. The report also stated:
- “The future of HOAC is still not clear, but there is a general agreement that it is a matter of high importance. Initially it was proposed to relocate the Centre to the nearby Denham Quarry...at a cost (to be borne by the promoter) of more than £20m. Then the estimated cost increased very sharply, for reasons that we have not investigated, and the Secretary of State wrote a letter indicating that the cost of relocation was unacceptable. On 17 November 2016 we were due to hear the petition that the London Borough of Hillingdon, but we were glad to hear that the Borough on the previous day had been able to reach an agreement in principle with the promoter on all outstanding issues. Other aspects of this important agreement are considered later, but in relation to the HOAC the agreement fixed the promoter’s maximum contribution as £26.5m, to be used (as the preferred option) for relocation to Denham Quarry; if that proves impossible the next option is expenditure on mitigation and improvement of the existing site; if that too proves impossible, some other relocation must be sought. The continuing uncertainty is unfortunate, but all parties are committed to work together to the best possible solution”. (Our emphasis added)*
- 3.17 **February 2017** – Following three years of parliamentary scrutiny, the High Speed Rail (London to West Midlands) Bill, received Royal Assent. The Bill became law, officially known as the High Speed Rail (London – West Midlands) Act 2017.
- 3.18 **August 2017** – A legal agreement between HS2 Ltd, the Secretary of State for Transport and LB Hillingdon was agreed. The Agreement states that the Council will use reasonable endeavours, working together with the HS2 Ltd to within three years from the date of the agreement, design and implement a scheme for the relocation of the former HOAC facility to Denham Quarry (also known as Summerlease Lake and New Denham Quarry) or such other suitable site or sites to be agreed with HS2 Ltd, the Association and the relevant local authorities. The agreement states that the cost should be no greater than £26.5 million.
- 3.19 **March 2017** – Planning application ref. CM/22/16 was granted by BCC. The Officer’s Report stated that the relocation of the former HOAC facility to Denham Quarry (also known as Summerlease Lake and New Denham Quarry) was considered to be suitable due to the following factors:
- The site is located close to the A40/M40, approximately 3.5 kilometres south of HOAC’s present location on Dews Lane and is therefore in a reasonable catchment of its current users.
  - The site has the ability to provide for the lake and land area to allow for a replacement of HOAC’s existing facilities at Dews Lane.
  - The proposed development will retain the openness of the Green Belt by confirming a use as an outdoor activities centre and the development can be considered as appropriate in Green Belt terms.
- 3.20 **September 2017** – It was confirmed at LBH’s Council meeting that HS2 had estimated that the new facility would cost £26,500,000 million and had agreed to pay that sum. Shortly after the submission of

planning application ref. CM/22/16, HS2 announced that it had reworked the costings at £55,000,000 and the Secretary of State had written to the Association informing them that the scheme was too expensive and that the Association would need to continue to operate on its current site. It was suggested by LBH to HS2 that LBH would be given £26,500,000 to complete the project, but the idea had been rejected. However, with the assistance of Boris Johnson MP and Nick Hurd MP, the project was back on the agenda. Councillor Puddifoot had asked Councillor Bianco to proceed with the provision of facilities for the Association in the Denham Quarry or elsewhere.

- 3.21 **December 2017** – It was agreed at a Cabinet Committee Meeting that a virement of £250,000 be made from unallocated capital programme budgets to fund initial costs relating to the relocation of the former HOAC facility to New Denham Quarry, noting that this would be funded externally (by HS2). Cabinet agreed allocation of funds for initial work to progress.
- 3.22 **December 2017** – It was agreed at a Cabinet Committee Meeting that full authority was delegated to the Leader of the Council and Cabinet Member for Finance, Property and Business Services, in consultation with the Deputy Chief Executive and Corporate Director of Residents Services, to progress the relocation of the former HOAC facility, including all necessary project, land, procurement and financial decisions, reporting back to Cabinet as required and for public information purposes.
- 3.23 **October 2020** – The former HOAC facility at Dews Lane closed.
- 3.24 **June 2022** – Cabinet approved the relocation of the former HOAC facility and other facilities to a new site at Broadwater Lake and the purchase of the land at Broadwater Lake to facilitate this at the cost set out in the report plus Stamp Duty. Cabinet also approved the capital release of £1,311,000 inclusive of the reallocation of previously released project funding, from the HOAC reprovision budget for project costs including the land purchase and associated fees, technical consultant fees and survey fees. Cabinet approved the decision that the new facility would be named as the Hillingdon Water Sports and Activity Centre (HWSFAC) as a working title. Cabinet had considered alternative sites to use but these were considered either not possible or unfeasible following discussions with relevant parties. These discussions are not available for publication by virtue of Paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972 (as amended).
- 3.25 **October 2023** – A planning application was submitted for the future HWSFAC facility at Broadwater Lake, Moorhall Road, Harefield, UB9 6PE. The application was validated under planning application ref. 2382/APP/2023/2906. A number of statutory consultee comments were received as part of the determination of the planning application, which are detailed at Section 7 of this Planning Statement.
- 3.26 **April 2024** – The legal agreement dated August 2017 between HS2 Ltd, the Secretary of State for Transport and LB Hillingdon was amended to include an extension of time to relocate the former HOAC facility to Denham Quarry (also known as Summerleaze Lake and New Denham Quarry) or such other suitable site or sites to be agreed with HS2 Ltd, the Association and the relevant local authorities. The deadline was extended to 01 January 2026.
- 3.27 **April 2024 (to present)** – a revised planning application is prepared for the Proposed Development for a reduced scheme at Broadwater Lake, Moorhall Road, Harefield, UB9 6PE.

## 4. Historic Operations & Users

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- 4.1 This section of the ASA provides detail of the historic operations at the former HOAC facility. This provides context as to what is proposed to be replaced as part of the Proposed Development.

### **Former HOAC Facility**

- 4.2 The Association is a registered outdoor and environmental youth educational charity which operated at the former HOAC facility. The former HOAC facility was based at Dews Lane, Harefield, UB9 6JN and was a valuable educational and leisure resource for people of all ages. The former HOAC facility was located in the Green Belt, just inside the M25 and often provided young people with their first “countryside” experience. The Former HOAC facility operated from 1996 until its closure in October 2020.
- 4.3 The former HOAC facility had a financial turnover of approximately £600,000 per annum and the centre’s work attracted a wide variety of grants from various sources such as the local authority, various Lottery Funds, Sport England, British Rowing, The Royal Yachting Authority Association, Heathrow Community Fund, local industry and commerce and also private donations.
- 4.4 The former HOAC facility spent more almost 30 years developing water and land based activities. The facility aimed to work at many levels and all the activities on offer were fun, challenging, and involved mental and physical commitment. The water and land based activities were designed wherever possible to ensure that children could work together as a group that led to developing communication and social skills.
- 4.5 The former HOAC facility included an office complex, changing rooms, showers, meeting rooms, lecture rooms, classrooms, patios, numerous shelters and group areas, a workshop complex which was based on an old barn, numerous garage stores, secure steel containers, rowing compound, stores and a pedal karting track. A maximum of 12 staff members stayed in seasonal accommodation at the former HOAC facility at one time. The seasonal accommodation consisted of four caravans with three beds in each caravan. Each caravan could only accommodate a single sex. A schedule of accommodation of the former HOAC facility can be found at **Appendix 3**.
- 4.6 The former HOAC facility offered several water based activities such as; sailing; rafting; kayaking; canoeing; bell boating; dragon boating; stand up paddle (SUP) boarding; windsurfing; rope swing; and rowing. It also offered a range of land based activities such as; indoor fencing; outdoor archery range; high ropes and low ropes; climbing; giant swing; juggernaut; caving; wall; nightline; games circuit; spiders web; swamp; plank challenge; non-motorised pedal karting circuit; trebuchet building; orienteering; blind maze; treasure quest; environmental studies; activity shelters for outdoor team building activities; bird watching; zip-wire; man-made caving system; fishing and angling facilities; camping; orchard and foraging; and pond dipping<sup>2</sup>.
- 4.7 Senior instructors and seasonal staff were employed at the former HOAC facility on a contracted hourly basis. Sessional duty staff and instructors were employed throughout the year, as required. Between 2013 and 2019, there was an average of five full-time members of staff<sup>3</sup>. The data relating to the number

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<sup>2</sup> Paragraph 18. High Speed Rail (London – West Midlands) Bill Petition Session 2013-14

<sup>3</sup> HOAC Centre Reports – 2013 to 2019.

of staff and users post-2019 is skewed given the impacts of the Covid-19 pandemic and the construction of HS2 on the operation of the former HOAC facility.

- 4.8 The former HOAC facility also offered a young leaders' scheme, which provided a highly effective route for young people to qualify and join as a staff member. The Young Leaders' scheme was an important aspect as it enabled volunteers to help out on the courses and then become instructors. Between 2013 and 2019 there was an average of 14 young leaders who took part in the course, annually<sup>4</sup>. The data relating to the number of young leaders post-2019 is skewed given the impacts of the Covid-19 pandemic and the construction of HS2 on the operation of the former HOAC facility.
- 4.9 The former HOAC facility also ran a successful training programme for teachers, which then allowed them to run many of the land activities. This reduced the cost for schools, colleges and other organisations such as guides, scouts and cadets.
- 4.10 The former HOAC facility closed in October 2020. There are now only two members of staff employed, who primarily maintain and repair equipment and in the summer holidays they assist with kayaking and dinghy sailing for very small groups at Troy lake.

### **Former HOAC facility users**

- 4.11 Annually, over 22,000 young people used the former HOAC facility, from a wide a range of economic and environmental backgrounds. Students primarily visited from primary, secondary and SEN schools. SEN students made up approximately 10% of the total users<sup>5</sup>. Students also came from Pupil Referral Units (PFUs), guides, scouts and cadets. The facility was also used by private members and community clubs.
- 4.12 Local schools, colleges, guides, scouts and cadets typically visited the facility on weekdays (Monday to Friday) between the months of April and September (inclusive). Other organisations including local businesses typically visited the facility on weekdays (Monday to Friday) all year-round. Private members and community clubs typically visited the facility on a weekend (Saturday or Sunday). Access was available on weekdays, and some members did use the facility then.

### **Schools, Colleges & Youth Organisations**

- 4.13 The former HOAC facility was primarily used by local schools, colleges, guides, scouts and cadets and local businesses from Monday to Friday. The majority of organisations were located within a 20-kilometre radius of the site. The former HOAC facility was ideally located for many schools and colleges in West London and other surrounding areas due to the proximity to the A40 and M25. The location of the former HOAC facility also allowed parents to drop-off students, in the event that group travel was too expensive for the school, college or organisation.

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<sup>4</sup> HOAC Centre Reports – 2013 to 2019.

<sup>5</sup> Paragraph 12. High Speed Rail (London – West Midlands) Bill Petition Session 2013-14

4.14 Nearly half of the facilities income came through group bookings<sup>6</sup> which consisted of school and college groups, guides, scouts, cadets and other youth groups. **Figure 2** shows the number of group bookings from 2002 to 2019. The number of group bookings exceeded 20,000 in 2006, 2008, 2010, 2013 and 2015. Between 2002 and 2019, there was an average of 18,681 annual group bookings. The data relating to the number and type of users post-2019 is skewed given the impacts of the Covid-19 pandemic and the construction of HS2 on the operation of the former HOAC facility.



**Figure 2: Number of group bookings from 2002 to 2019**

- 4.15 The former HOAC facility was the largest facility within the M25 which offered both land and water activities for students at a single location. This was welcomed by schools and colleges as it provided the students with an opportunity to experience a breadth of outdoor and indoor activities within a single day.
- 4.16 A single-day activity kept the cost low for many families, state schools and organisations such as guides, scouts and cadets who cannot afford to pay for overnight residential trips such as those offered by organisations such as PGL. The cost of overnight trips can often rise in line with inflation and fuel prices. The former HOAC facility provided an affordable alternative for children and students to experience a range of outdoor and water based activities. A school or guides / scouts / cadets' group who came with their own trained leader would pay approximately £6.80 per person, per day. A school or guides / scouts / cadets' group which required trained leaders would pay approximately £18 per person, per day.
- 4.17 The day-to-day programme at the former HOAC facility was dependent on the type of user. It was also dependent on the distance of the school from the former HOAC facility, given that students often visited the former HOAC facility after morning registration and would return to school before the end of the school day for pick-up or school transport.
- 4.18 Examples of programmes for a SEN school, a primary school and a secondary school are outlined below at **Table 1**. Copies of the programmes can also be found at **Appendix 4**.

<sup>6</sup> HOAC Centre Report - 2019

**Table 1: Programme examples**

| School Name and Address                              | Type of School | Distance to former HOAC facility | Programme                    |
|--|----------------|----------------------------------|------------------------------|
| Meadow Special School, Royal Lane, Uxbridge, UB8 3QU | SEN            | 4.5 miles                        | 1000 to 1100 or 1400 to 1500 |
| Hillingdon Primary School                            | Primary        | 5 miles                          | 0930 to 1130<br>1200 to 1400 |
| Dr Challoner's Grammar School                        | Secondary      | 12 miles                         | 0915 to 1145<br>1215 to 1445 |

- 4.19 The day programmes offered by the former HOAC facility allowed students to travel to and from the site and complete full courses within school hours. This allowed students to attend morning registration at school and return to school before the end of the school day for pick-up or public transport. Whilst there is no mandatory travel time limit for school trips, the government's best practice guideline<sup>7</sup> is that a child of primary school age should not travel for longer than 45 minutes and a child of secondary school age should not travel for more than 75 minutes. For children with SEN and / or disabilities, a shorter journey time is usually more appropriate.
- 4.20 The former HOAC facility was a preferred location for Special Educational Needs (SEN) schools, as they offered a one-hour course of a single activity of choice. Some students at the SEN schools could not attend a full-day course due to their disability. There was also very little noise pollution at the former HOAC facility. A noisy facility would not have been suitable for some students with disabilities such as Autism Spectrum Disorder (ASD), sensory processing disorder or ADHD as being located close to a noise-generating facility or activity can be highly problematic. A noisy environment can interfere with the ability to focus, listen and process information. This can be particularly challenging for SEN students who already face difficulties with cognitive processing, speech or auditory problems.
- 4.21 The former HOAC facility was also used by Pupil Referral Units (PRU) which is a type of alternative educational provision, designed to support children and young people who are unable to attend mainstream school for various reasons, such as short or long-term illness, exclusions, or difficulties integrating into a traditional school environment. PRUs offer a more tailored and supportive learning environment to help the students re-engage with education. Local PRU schools would use the facility once a week which would not have been possible if the facility was located far away.
- 4.22 The number of students at the former HOAC facility on a weekday was dependent on the school or organisation, as SEN schools and PRU's visited the former HAOC facility in smaller groups. A Traffic Survey for one week a month in 2015, on a Monday to Friday, between 0800 and 2100 was undertaken for planning application ref. ref. CM/22/16. The figures were not submitted as part of the planning application, but they are set out below at **Table 2**.

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<sup>7</sup> Department for Education. New home to school travel and transport guidance. 25 March 2014.



**Table 2: Traffic Survey Results (2015)**

| Month     | Staff | Groups* | Members | Total |
|-----------|-------|---------|---------|-------|
| January   | 5     | 16      | 0       | 21    |
| February  | 6     | 16      | 0       | 22    |
| March     | 8     | 32      | 2       | 42    |
| April     | 8     | 32      | 4       | 44    |
| May       | 9     | 96      | 15      | 120   |
| June      | 11    | 160     | 55      | 226   |
| July      | 17    | 160     | 55      | 232   |
| August    | 21    | 16      | 195     | 232   |
| September | 11    | 64      | 2       | 77    |
| October   | 9     | 32      | 0       | 41    |
| November  | 7     | 16      | 0       | 23    |
| December  | 6     | 16      | 0       | 22    |

\*Groups are minibuses, which typically held 16 children, students and / or adults. The total figure given is the number of people in the group.

- 4.23 The 2015 traffic survey results demonstrate that an average of 186 people visited the site on a weekday, in between the months of April and September. This consists of staff, groups and individual members. The 2015 traffic survey results demonstrate that an average of 100 students visited the site on a weekday, in between the months of April and September.

#### **Private Individuals & Community Clubs**

- 4.24 The former HOAC facility was primarily used by private individuals and community clubs on a Saturday and Sunday. The facility was mainly used for water based activities such as sailing and angling.
- 4.25 The HOAC facility was a base for many community clubs such as; Queensmead Sailing Club, Hillingdon Rowing Club; Hillingdon Junior Canoe Club; Brunel University Rowing Club; Tera Junior Sailing Club; Pico Junior Sailing Club; Laser Junior Sailing Club; Junior Windsurf Club; Challenger Disabled Sailing Club; Tristars Triathlon Club; London Youth Games (sailing, rowing and canoeing); and Duke of Edinburgh Award groups.

- 4.26 The Queensmead Sailing Club was the adult sailing club at the former HOAC facility. Since the closure of the former HOAC facility, the Sailing Club has gone out of business and has donated what is left of the Sailing Club and its equipment to the Association.
- 4.27 The former HOAC facility was also used for training by the Ambulance, Fire and Police services and some local businesses. The former HOAC facility hosted several community events such as a special needs day, a family open day and a young leaders' day.
- 4.28 The former HOAC facility also offered adult courses. From 2002 to 2019, there was an average of 109 adult courses booked annually<sup>8</sup>. These courses were in sailing, kayaking, windsurfing and sculling. The data relating to the number of adult courses booked post-2019 is skewed given the impacts of the Covid-19 pandemic and the construction of HS2 on the operation of the former HOAC facility.
- 4.29 During the easter, spring, summer and autumn school holidays, the facility offered courses to children. From 2002 to 2019, there was an average of 1,088 holiday course booked annually<sup>9</sup>. These courses were in sailing, kayaking, windsurfing, splash zone, land activities and rowing.
- 4.30 The Transport Assessment carried out as part of the planning application for ref. CM/22/16 included a Manual Classified Count (MCC) junction survey at the existing access at the former HOAC facility. The MCC survey was undertaken between 0700 and 1900 hours on Sunday 28th February 2015 and Saturday 5th March 2015. The survey data also included the traffic generated by a garage and a small number of dwellings, which are also served by the access road. The garage is open Monday to Saturday but closed on Sunday and so the majority of movements recorded during the Sunday survey are likely to be associated with the former HOAC facility.
- 4.31 The MCC junction survey confirms that there were **137** movements into the site and **141** movements out of the site between 0700 and 1900 on Saturday 5th March 2015. It also confirms that there were **118** movements into the site and **122** movements out of the site between 0700 and 1900 on Sunday 28th February 2015<sup>10</sup>.
- 4.32 The Transport Assessment states that at the time of the survey, the level of activity during both survey days was quite high for the time of year and probably more akin to expected visitor numbers for early summer.

### **Operation at Troy Lake (Easter 2025)**

- 4.33 During the Easter school holidays the Association ran a significantly reduced operation at Troy Lake, off Denham Way. Troy Lake is currently used by Rickmansworth Sailing Club (RSC) who have agreed to allow the Association to operate from Troy Lake on a temporary basis, which will likely run again in summer 2025. The temporary operation is to ensure that the two remaining former HOAC facility employees can remain employed whilst a suitable alternative location is sought, and the Planning Application is being determined.
- 4.34 The Association's offer currently consists of kayaking and dinghy sailing in the school holidays only. The Association are not operating during the term-time and are not offering any services to schools,

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<sup>8</sup> HOAC Centre Report – 2019.

<sup>9</sup> HOAC Centre Report – 2019.

<sup>10</sup> Volume 12: Transport Assessment (May 2016) submitted as part of planning application ref. CM/22/16

colleges, youth organisations, private adult individuals or community clubs. The Association have advised that there is an average of 20 children visiting the site per day during the school holidays. This is a significantly reduced operation in comparison to the average of 1,088 student holiday courses, 109 adult courses and 18,681 groups which booked annually between the years of 2002 and 2019.

- 4.35 The Association cannot offer their full services at Troy Lake, as the land area is significantly smaller to that at the former HOAC facility. The land area measures at less than two hectares which is not large enough to accommodate both the Association and RSC's operation.
- 4.36 There are also only two toilets, and one shower room located at Troy Lake, which is not enough for a replacement facility. The storage on site for the Association's equipment is limited to one small shed and there is no land available for camping activities. Troy Lake does not have the facilities to accommodate school, college or other youth organisations and as set out above, these user groups are clearly an integral part of the Association's operation.
- 4.37 In summary, the Association's current operation at Troy Lake is a short-term option to allow their two existing employees to remain employed. The Association cannot operate from this site in the medium to long-term.

## 5. Need for Replacement Site

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- 5.1 Since the HS2 Bill was published in November 2013, the Association have made it clear that they are seeking to replace the former HOAC facility given that it was a valuable educational and leisure facility and resource for people of all ages.
- 5.2 The purpose of the Proposed Development is:
- **Reducing barriers to physical and outdoor activity through the construction of an improved quality and more inclusive outdoor activity centre in Hillingdon** – this replaces the outdated facilities at the existing HOAC site with brand new accessible facilities at Broadwater Lake. This supports physical and mental health outcomes by promoting higher levels of physical activity and increased access to nature for those who have low levels of participation such as women and girls, ethnic minority groups and disabled people (with both physical and mental disabilities).
  - **Access to employment and volunteering opportunities during the construction, operation and maintenance of the Proposed Development** – the inclusive design of staff facilities and accommodation makes opportunities for employment at the Proposed Development more accessible for disabled people, women and young people (especially those under 18 years of age), disadvantaged groups such as Gypsy, Roma Travellers, SEND students, asylum seekers and refugees who could all benefit from employment and volunteering opportunities, if supported by relevant training, procurement and recruitment policies.
  - **Access to learning and skills development opportunities** – this includes educating children and young people about ecology and care for the environment. It will also provide leadership skills and training opportunities for young people as well as informal learning, role models, mentoring, coaching and volunteering opportunities.
- 5.3 The legal agreement between HS2 Ltd, LB Hillingdon and the Department of Transport (dated August 2017 and amended in August 2024) permits the relocation of the former HOAC facility to Denham Quarry (also known as Summerleaze Lake and New Denham Quarry) or any other such suitable site or sites to be agreed with HS2 Ltd.
- 5.4 Several options have been proposed including the continued use of the former HOAC facility and the relocation to Denham Quarry (also known as Summerleaze Lake and New Denham Quarry). Further detail on these options and their assessment as potential alternative sites for the Proposed Development are set out below.
- 5.5 The Association previously operated from the former HOAC facility which lies within the administrative boundary of LB Hillingdon. As the facility was located within the boundary of LB Hillingdon, it therefore qualified for a £50,000 annual grant from LB Hillingdon. The grant amount reflects the level of local usage and benefit. Although it is not an absolute requirement for the new site to be located in LB Hillingdon, the provision of a grant supports the new site being located within the administrative boundary.

## Continued Use of Former HOAC Facility

- 5.6 Since the HS2 Bill was published in November 2013, it has been made clear by the Association that continuing to use the former HOAC facility or using the former HOAC facility after the construction of HS2, is not a viable option. The HS2 Phase One Environmental Statement (November 2013) concluded that the users of the former HOAC facility would experience significant visual and noise effects. The House of Commons Select Committee's First Special Report (March 2015) also recognised that it would be difficult for the Association to continue to operate at the former HOAC facility.
- 5.7 Given how close the HS2 line is to the former HOAC facility, the noise and vibration from the viaduct would pose a safety risk for future users of the facility, particularly those from SEN organisations – which previously made up 10% of the former HOAC facility users. A noisy facility is not suitable for some students with disabilities such as Autism Spectrum Disorder (ASD), sensory processing disorder or ADHD as being located close to a noise-generating facility or activity can be highly problematic. A noisy environment can also interfere with the ability to focus, listen and process information. This can be particularly challenging for students who already face difficulties with cognitive processing, speech or auditory problems.
- 5.8 The unsuitability of the former HOAC facility operating during the HS2 construction was referenced in the Officer's Report for planning permission ref. CM/22/16. The permission allowed the extension of the existing sand gravel extraction and restoration of Denham Quarry (also known as Summerleaze Lake and New Denham Quarry) for the relocation of the former HOAC facility. The Officer's Report states:
- "If HOAC were to remain open, the HS2 Phase One Environmental Statement 1 concluded that during construction of HS2 users of the facility will experience significant visual and noise effects affecting amenity which would therefore make it unlikely that it could operate during the five year construction period. The HS2 Phase One Environmental Statement also reports that closure for five years could mean that HOAC would lose its users and as a result its long-term viability could be affected".*
- 5.9 The construction of a viaduct has also created wind shadows and areas of reduced wind speed. The Association require a location which is not too restrictive on wind, given the water based activities that are proposed to take place at the Proposed Development, such as sailing. This was made clear in the House of Lords Select Committee First Special Report of the Session (December 2016). The importance of good wind conditions is also set out in the Sailing Suitability Requirements Report prepared by Peter Bentley Limited. The report states that the Proposed Development should have:
- "Unobstructed wind flow across a substantial portion of the lake in all wind directions".*
- 5.10 Whilst the former HOAC facility provided a very well used and valuable resource for outdoor activity, it cannot now operate effectively due the operational constraints imposed by the erection of the HS2 infrastructure and use. The resultant closure of the former HOAC facility has provided the opportunity to rationalise and update the facility with a view to provide a space which is more efficient and operationally appropriate. The facilities at the former HOAC facility were outdated, incomprehensive and non-compliant with relevant standards and legislation. User group engagement undertaken as part of an Equality Impact Assessment<sup>11</sup> identified inadequate accessibility, and insufficient changing rooms

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<sup>11</sup> Equality Impact Assessment prepared by Equality Impact Consulting Ltd (May 2025)

and toilet facilities. Improvement such as secure drop-off areas, better storage solutions and enhanced communal facilities were also identified as being required.

## **Denham Quarry**

5.11 Planning permission has been granted for the relocation of the former HOAC facility to New Denham Quarry (under planning permission ref. CM/22/16). The submitted Planning Statement sets out that the need for the development is justified due to the need to relocate an existing local recreational facility.

5.12 The Officer's Report for planning permission ref. CM/22/16 states:

*"The current centre provides a wide selection of both water-based and land-based outdoor activities including sailing, windsurfing, canoeing, caving, a giant swing, low and high ropes courses, archery, orienteering and camping. In designing this proposal, care has been taken to ensure facilities are recreated or provided on a like-for-like basis".*

5.13 A number of new single storey, steel-framed buildings were approved, including; a main office / club house located to the south of the main central lake; a workshop located behind the main office / club house; a boat store located to the south of the eastern / rowing lake; camping toilets and showers contained in two blocks and an accessible toilet and shower; seasonal staff accommodation to provide 12 bedrooms; and a total of 13 small shelters, located one adjacent to each activity.

5.14 In addition to the new buildings, a number of new facilities for outdoor recreation (e.g. pedal karting, tunnelling, low level ropes, archery, giant swing and high level climbing) were approved. The Officer's Report states that those facilities would replicate those currently in place at the former HOAC facility. A camp site, low-level woodland activities area and open grassed area was also approved.

5.15 During the determination of planning permission ref. CM/22/16, no objections were received from statutory consultees relating to the like-for-like replacement of facilities or the replacement of facilities.

5.16 Despite the relocation of the former HOAC facility to New Denham Quarry being the preferred option for all interested parties, the relocation to New Denham Quarry was prohibited by the Secretary of State given that the estimated cost of relocating the facility and the subsequent construction increased to £55,000,000.

5.17 It is clear that the Proposed Development cannot be located at New Denham Quarry given the costs associated with the relocation and subsequent construction. On this basis – and in line with the legal agreement between HS2 Ltd, LB Hillingdon and the Department of Transport (dated August 2017 and amended in August 2024) – a new location is being sought for the Proposed Development.

## 6. Proposed Operations & Users

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### Proposed Operations

- 6.1 The Proposed Development will support the following water based activities all of which formed part of the operation of the former HOAC facility:
- Maintaining existing Broadwater Sailing Club uses;
  - Dinghy sailing;
  - Kayaking / Canoeing;
  - Stand up Paddleboarding;
  - Two dragon boats;
  - Windsurfing;
  - Raft building and use; and
  - Angling (this is also an existing use).
- 6.2 The lake at the former HOAC facility measures at approximately 18.9 hectares. The Association have advised that the usable sailing area was approximately 16.1 hectares.
- 6.3 The Association have advised that at peak times of the year the lake would be near to capacity in terms of spatial requirements for each activity and ensuring the safety of users. A minimum of seven hectares is required for the Proposed Development given that was the amount used at the former HOAC facility. This provision is a significant reduction in comparison to the 17.5 hectare lake which was approved at Denham Quarry (also known as Summerlease Lake and New Denham Quarry) under planning permission ref. CM/22/16.
- 6.4 As a replacement facility is required, the proposed development will support the following land based activities, all of which formed part of the operation of the former HOAC facility:
- Indoor fencing (in the Main Building);
  - Activity shelters for outdoor team building activities;
  - Bird watching;
  - Camping:
    - Tents;
    - Sheltered camping (for disabled children/adults, underneath shelter on hard surface near to toilet facilities);
    - Indoor camping (for disabled children/adults inside Main Building).
  - Orchard and foraging
  - Pond dipping;
  - Artificial above-ground caving system; and
  - Environment training an education including bird watching.

- 6.5 The land area at the former HOAC facility measured at two hectares. The Association have advised that at peak times of the year, the facility would be near to capacity in terms of spatial requirements for each activity and ensuring the safety of all users by providing the correct level of staff. As such, a minimum of two hectares is considered to be required for the above land-activities to take place.

## Proposed Users

- 6.6 LB Hillingdon has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that activities do not lead to unlawful discrimination (direct or indirect), that it advances equality of opportunity and that it fosters good relation between those with a protected characteristic and others.
- 6.7 Protected characteristic groups include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The PSED must be exercised in substance, with rigour and with an open mind. The assessment of the risk of discrimination must be done before a decision is made by LB Hillingdon and not as an afterthought.
- 6.8 LB Hillingdon is committed to promoting equality of opportunity, celebrating and valuing diversity, eliminating unlawful discrimination, harassment and victimisation, and promoting good relations. LB Hillingdon set out the following aims<sup>12</sup>:
- Create a strong and resilient community in Hillingdon;
  - Counter extremism and hate in all its forms;
  - Bring communities together to promote cohesion and integration; and
  - Build a strong sense of belonging and pride where all people in Hillingdon feel valued and included, whether living, working within, or visiting the borough.
- 6.9 LB Hillingdon also want to reduce barriers to physical and outdoor activity through the construction of an improved quality and more inclusive outdoor activity centre. This will support physical and mental health outcomes by promoting higher levels of physical activity and increased access to nature to those who have low levels of participation such as women, girls, ethnic minorities and disabled people (with both physical and mental health disabilities).
- 6.10 The Proposed Development will provide land and water based activities and overnight accommodation facilities for a diverse range of user groups, but it will predominately serve children and young people. The proposed user groups identified for the proposed development are set out at **Table 3**.

**Table 3: Proposed User Groups**

| User Group | Description of needs  |
|------------|---|
| Schools    | School groups will use the facility for both day trips and overnight stays. School children aged six and above will use the facility. Students will come with teachers and parents / carers and could have a variety of physical and mental needs. In addition, different school groups, with children of different ages, abilities, genders and religions could all be using the facility concurrently. Generally, these groups will visit the |

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<sup>12</sup> <https://www.hillingdon.gov.uk/article/11543/Our-commitment>



|   |  |
|---|--|
|   | facility for a single time, so the facility needs to be readable to new users. Small school groups, including children from PRUs and SEN schools, may visit the facility regularly.  |
| Guides and Scouts                                       | Guide and scout groups will use the facility, often in large numbers of up to 200 people at one time. They may visit the facility for the day or for overnight stays. Their gender and age split may be mixed or one-sided.  |
| Cadets  | Typically, cadet groups may be using the facility in the colder, winter months when other groups may not be present. Sea cadets include children aged 10 and above and army and air cadets include children aged 12 and above.   |
| Children, young people and adults with additional needs | Children, young people and adults with additional needs, including those with autism, multiple learning disabilities and / or physical impairments will use the facility. These users need to be able to use all the same facilities as the peers with no disability.  |
| Sailing Club Members                                    | Sailing will continue to be a key operation for the Proposed Development. Sailing members will therefore require frequent access and use of the facility throughout the year. This will include use of the storage facilities, workshop and changing facilities during training and maintenance periods, as well as an observation room to allow families to gather during both training sessions and races.                                   |
| Families  | Families will require frequent access and use of the facility throughout the year. Children may be accompanied by their parents or guardians who could have other children with them of different ages. Families will need to have the ability to change together, and consideration should be given to how the changing rooms are accessible and comfortable for different needs.   |
| Ecologists  | The Proposed Development should have the option to operate as a Field Study Centre as part of the Field Studies Council national offering. This will allow those training as ecologists to study together.   |
| Permanent Staff   | Staff will be hired, so the facility should be an exemplar workplace in line with the employment law under the Equality Act 2010.  |
| Seasonal live-in staff / those in training              | Seasonal, overnight staff will form a large part of the operational staff at the Proposed Development during peak times. These positions are often taken up by young people training to become professional activity instructors. Staff will require basic accommodation, access to food preparation, private living space and their own shower facilities. Some of these users may be aged 16, where safeguarding will have to be considered. |

6.11 As previously outlined, the former HOAC facility was outdated, incomprehensive and non-compliant with relevant standards and legislation. As the former HOAC facility was built in the 1990s, there was limited guidance and best practice measures in place, particularly for users with accessibility requirements. To ensure that the Proposed Development can be utilised by all end-users, it will be designed and constructed in accordance with the following legislation and design guidance:

- **Equality Act 2010 and the Public Sector Equality Duty (2010)** – UK legislation which protects the rights of all individuals against unlawful discrimination and advancing equal opportunities for all. Section 149 of the Equality Act sets out the Public Sector Equality Duty (PSED) to which LB Hillingdon, as a public body, is subject in carrying out all its functions.
- **London Plan (2021)** – Policy GG3 ('Creating a healthy city') of the London Plan supports more active and healthy lives for Londoners to enable them to make healthy choices including improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports. Policy D5 (inclusive design) outlines the requirements to incorporate safe and dignified emergency evacuation for all building users. Policy D6 (Housing Quality and Standards) outlines the minimum space requirements for bedrooms.
- **Building Regulations Part T (2024)** – provides technical guidance on the design and layout of universal toilets, ambulant toilets and toilet cubicles. It relates to toilet accommodation in new buildings.
- **Building Regulations Part M (2021)** – provides technical guidance on the access to and use of buildings.
- **British Standards (BS) 8300 (Accessibility)** – provides technical guidance for designing accessible and inclusive built environment. It is a code of practice, not a legal requirement, but is widely considered to be the best practice measure for creating spaces that are usable and accessible for people of all disabilities, including those with disabilities.
- **British Standards (BS) 30416 (Menstrual Health)** – provides technical guidance for organisations to create more inclusive and supportive places for people who menstruate.
- **British Standards (BS) PAS6463 (Public Accessible Standard) (Design of the Mind)** – provides technical guidance on designing and managing built environments to be more inclusive of neurodivergent individuals and others who may experience sensory processing differences.
- **Sport England Guidance 2024 (AISF D)** – provides guidance on changing and toilet provision within sports and leisure facilities.
- **Sport England 'Uniting the Movement' Strategy (2021 - 2031)** – sets out a vision, mission and strategy for becoming a nation of more equal, inclusive and connected communities where people live happier, healthier and more fulfilled lives. The strategy aims to tackle deep-rooted inequalities in sport and physical activity which excludes people from being active because the right options and opportunities are not available. This includes; disabled people and those with a long-term health condition; women; and people from Asian and black backgrounds.
- **Paths for All (Outdoor Accessibility Guidance)** – helps make outdoor places and spaces, routes and facilities more accessible, and outdoor experiences more inclusive, so they can be enjoyed by everyone. It is designed as a practice reference for those managing outdoor spaces to create environments that are welcoming and inclusive, promoting participation and enjoyment of the outdoors.
- **Sensory Trust (Access Chain: An Inclusive Design Tool)** – ensures that access plans and reviews relate to all parts of a visitor experience, not just buildings and infrastructure.
- **Department for Education (DfE) Advice on Standards for School Premises (2015)** – this advises that showers should generally be in the form of separate cubicles for privacy reasons.
- **The Equality Act (2010)** – a UK law that protects individuals from discrimination, harassment and victimisation based on nine protected characteristics including age, disability race, religion or belief, sex or sexual orientation.

- **Building Bulletin 103 (2018)** – provides guidelines for mainstream schools.
- **Ofsted Strategy (2022-2027)** – sets out Ofsted’s focus on improving outcomes for children and learners. There are four equality objectives which includes using their independent voice to share their insights, which will inform practitioners, policy makers and decision makers.
- **Care Quality Commission (Regulation 15)** – ensures that premises and equipment is kept clean and cleaning must be done in line with current legislation and guidance. It states that the premises must be suitable for the service provided, including the layout, and be big enough to accommodate the potential number of people using the service at any one time. Adequate support facilities and amenities must also be provided where relevant to the service being provided. This includes sufficient toilets and bathrooms for the number of people using the service, adequate storage space, adequate seating and waiting space.
- **NSPCC’s Child Protection in Sport Unit** – provides further resources and guidance to help sports organisations implement the established standards for safeguarding and protecting children in sports facilities. These standards aim to create safe environments and prevent harm, encompassing various aspects of child protection.
- **British Standards (BS) 6465 (Sanitary Provision)** – provides technical guidance of the design, provision and space requirements of sanitary facilities and appliances.
- **Building Regulations Part B Volume 2 (2019) (as amended)** – provides technical guidance on fire safety.
- **Technical Housing Standards (2015) Nationally Described Space Standards** – provides guidance on internal space requirements for bedrooms.

6.12 The Schedule of Accommodation presented at Appendix 3 demonstrates the difference in what was required for such a Proposed Development in the 1990s and what is now required.

## 7. Defining the Search Area

- 7.1 The search area is a geographic area within which it is appropriate to search for sites which could deliver the Proposed Development. The search area has been informed by the following factors.

### Location of Existing Users

- 7.2 A list of users of the former HOAC facility from 2015 has been mapped to show the locational spread of users. It includes the Under 18s, Young Leaders (Concession), adult individuals, concessions, family leaders, schools and organisations and students.
- 7.3 The list from 2015 is the most recent list of all users that the Association has. This data from 2015 also helped inform the proposed development submitted and approved under planning permission ref. CM/22/16 at New Denham Quarry. No other data has been retained by the Association due to GDPR restrictions.
- 7.4 On review of the 2015 user data, 83% of the users were located within a 20-kilometre radius of the former HOAC facility. Two maps (measuring at a scale of 1:1,370,000 and 1:200,000) are shown at **Appendix 5**. A summary of the locational split by local authority is shown at **Table 4**.

**Table 4: Location of Former HOAC Facility users in 2015**

| Local Authority                     | No. of users | Percentage |
|-------------------------------------|--------------|------------|
| Buckinghamshire County Council      | 51           | 18.1%      |
| Westminster City Council            | 3            | 1.1%       |
| Dacorum Borough Council             | 8            | 2.8%       |
| Ealing Council                      | 38           | 13.5%      |
| Harrow Council                      | 40           | 14.2%      |
| Hertsmere Borough Council           | 4            | 1.4%       |
| London Borough of Hillingdon        | 101          | 35.9%      |
| St Albans City and District Council | 2            | 0.7%       |
| Three Rivers District               | 15           | 5.3%       |
| Watford Borough Council             | 10           | 3.6%       |

- 7.5 Table 4 shows that the majority of users of the former HOAC facility travelled from the administrative areas of LB Hillingdon, Harrow Council and Ealing Council.
- 7.6 In addition to the groups shown in the table, there was one individual from each of East Hampshire District Council, London Borough of Enfield, London Borough of Hammersmith & Fulham, London Borough of Wandsworth, Royal Borough of Windsor and Maidenhead, Milton Keynes Council, Runnymede Borough Council, South Oxfordshire District Council and Vale of White Horse District Council.

## Distance to previous HOAC facility

- 7.7 The location of the former HOAC facility in close proximity to the A40 and the M25, meant that local primary, secondary and SEN schools and PRUs could travel to and from the facility and complete full-day courses within school hours.
- 7.8 As previously set out, whilst there is no mandatory travel time limit for school trips, the government's best practice guideline<sup>13</sup> is that a child of primary school age should not travel for longer than 45 minutes and a child of secondary school age should not travel for more than 75 minutes. For children with SEN and / or disabilities, a shorter journey time is usually more appropriate.
- 7.9 The location of the former HOAC facility also allowed parents to drop-off students in the event that group travel was too expensive for the school, college or youth organisation.
- 7.10 The former HOAC facility was also a preferred location for local SEN schools and PRUs, as they it offered a facility for local SEN schools who could not attend a full-day course due to their disability.
- 7.11 The importance of the new site being in close proximity to the former HOAC facility was outlined in the Officer's Report for planning application ref. CM/22/16 at Denham Quarry (also known as Summerlease Lake and New Denham Quarry). The site was previously selected by HS2 Ltd and the Association as it was:

*"...close to the south of the A40/M40, approximately 3.5km south of HOAC's present location on Dews Lane and is therefore in a reasonable catchment of its current users".*

## Accessible Location

- 7.12 Former users of the former HOAC facility – particularly local schools, colleges and youth organisations – have advised that the facility at Dews Lane was suitably located and easily accessible given its position in relation to the A40 and M25. As set out above, this meant that local schools could travel to and from the site and complete full day courses within school hours. It also allowed parents to drop-off students in the event that group travel was too expensive for the school, college or youth organisation.
- 7.13 The former HOAC facility also offered a young leaders' scheme, which provided a highly effective route for young people to qualify and join as a HOAC staff member. The Young Leaders' scheme was an important aspect as it enabled volunteers to help out on the courses and then become instructors. Between 2013 and 2019, there was an average of 14 young leaders who took place in the course, annually. Many of the Young Leaders may not be able to access the site via private car, so public transport accessibility should be a key feature of any future site.
- 7.14 Based on the above, a search area of 20-kilometres from the Dews Lane site has been used. A map of the search area can be found at **Appendix 6**.

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<sup>13</sup> Department for Education. New home to school travel and transport guidance. 25 March 2014.

## Single Location

- 7.15 The Association have highlighted the importance of the proposed water and land based activities being located on a single site. Keeping all activities on one site means that children and students are not exposed to the risks associated with off-site travel such as traffic, road crossings or unfamiliar locations.
- 7.16 In an emergency, staff located on a single site can respond more quickly and effectively as they are all located nearby and familiar with the same site protocols.
- 7.17 Having the land and water based activities located on one site also means increased participation time, with more time spent on activities rather than travelling between sites. This is particularly important for schools, colleges and local organisations who are only on site for a single day and arrive after morning registration at their school or organisation and leave the facility in time for pick-up or public transport.
- 7.18 For children or students with mental or physical disabilities or additional needs, activities on the same site are generally better, as it provides a familiar surroundings, reduced transition and travel times, and fewer communication issues.
- 7.19 Finally, activities located on the same site reduces transportation costs and the number of staff needed onsite which makes the facilities more affordable.

## 8. Defining the Site Assessment Criteria

### Stage 1 Assessment Criteria

- 8.1 Having established an area within which it is appropriate to search for alternative sites, it is important to consider the fundamental criteria which, if unmet, would prevent a site from being considered as a replacement facility. Each long-listed site has been assessed against the Stage 1 Assessment Criteria, which are set out in **Table 5**.
- 8.2 In line with Surrey County Council's Alternative Site Assessment Guidance (May 2021), a simple ranking system has been used to assess the identified sites against the Stage 1 Assessment criteria. The long-list assessment table has been colour coded to show each site against the key criteria. Green shows compliance and red shows non-compliance.

**Table 5: Stage 1 Site Assessment Criteria**

| Criteria                 | Considerations   |
|--------------------------|--|
| <b>Lake Surface Area</b> | <p><b>The lake at the former HOAC facility measured at approximately 18.9 hectares and the sailing area measured at approximately 16.1 hectares.</b> The Association have advised that on a peak day, the lake would be near to capacity in terms of the spatial requirements for each water based activity and ensuring the safety of the users.</p> <p><b>A minimum lake surface area of seven hectares is considered to be required for the Proposed Development to operate,</b> without a reduction in the average number of users and the extent of the activities that were provided at the former HOAC facility. This minimum lake surface area would also ensure the safety of users.</p> <p>The requirement of seven hectares is also significantly less than the scheme approved under planning permission ref. CM/22/16.</p> <p><b>For all water based activities to take place, there must be direct access to the lake.</b></p> |
| <b>Land Surface Area</b> | <p><b>The land at the former HOAC facility measures at two hectares.</b> The Association have advised that on a peak day, the land would be near to capacity in terms of the spatial requirements for each land based activity and ensuring the safety of the users.</p> <p><b>A minimum lake surface area of two hectares is considered to be required for the Proposed Development to operate,</b> without a reduction in the average number of users and the extent of the activities that were provided at the former HOAC facility. This minimum land surface area would also ensure the safety of users.</p>   |

|                          |  |
|--------------------------|--|
|                          | <p><b>For all the land-based activities to take place, the land must not require the significant loss of vegetation and habitat.</b></p>   |
| <b>Accessibility</b>     | <p><b>Vehicular access to the site must not have weight or height restrictions. Minibuses typically weigh at a maximum of 3.5 tonnes and a typical school bus (single-decker) weights at a maximum of 16 tonnes.</b></p> <p><b>The site must be able to provide appropriate vehicle access as most users are anticipated to travel by vehicle modes to the site. The site must also be accessible for HGVs and emergency vehicles.</b></p> <p><b>There must be an appropriate pedestrian route to the vicinity of the site, including footway provision and crossing points.</b> The former HOAC facility could be accessed via two Public Right of Ways (PRoW) (ref. DEN/22/1 and DEN/24/1). PRoWs should not go into the site, for site security purposes.</p> <p><b>Cycle routes should be available within the vicinity of the site to encourage sustainable travel to the site.</b> The former HOAC facility did not have cycle routes into the site, which may have restricted some users from travelling sustainably to the facility.</p> <p><b>The site must be located within an appropriate distance to public transport services such as bus stops and rail stations, to provide opportunity for sustainable transport.</b> Transport for London's Public Accessibility Level (PTAL) methodology will be applied from the main access point (from the local highway network) given the rural nature of the potential alternative sites. The calculation assumes that people will walk up to 640 metres (approximately eight minutes) to a bus service and up to 960 metres (approximately 12 minutes) to a Rail or Tube Service. The former HOAC facility was not well served by public transport, with the nearest bus stop located 1.6 kilometres from the site access.</p> |
| <b>Site Availability</b> | <p><b>The site should be owned by LB Hillingdon, or available to purchase by LB Hillingdon.</b> The agreement to replace the former HOAC facility (dated August 2017) was agreed between HS2 Ltd, the Department for Transport and LB Hillingdon. <b>LB Hillingdon require full ownership of the Proposed Development to guarantee its operation and management.</b></p> <p>Where a site has an existing use that is expected to continue for the long-term, then the site has been assessed as <u>not available</u>. The exception to this is where there are existing water and land based activities on a site, which could operate in tandem or be re-provided as part of the Proposed Development.</p>  |



|   |   |
|---|---|
|   | <p>Where a site has no existing use or the existing use is due to cease in the short-term, the site has been assessed as available, as there may be the opportunity to purchase the site.</p> <p>Local authorities can use their compulsory purchase powers (CPO) for land within their administrative boundary, where it is expedient to do so and where there is a compelling case in the public interest to make a CPO application.</p>  |
| <b>Designated Sites</b>   | <b>The site must not be in an internationally or European protected site such a special area of conservation (SAC), special protection area (SPA), Ramsar wetland, or potential SPA, possible SAC or proposed Ramsar wetland.</b>   |
| <b>Intersected by HS2, other railway lines or in close proximity to noisy infrastructure and activities</b> | <p><b>The site should not be intersected or in very close proximity to HS2, other railway lines or key road networks, or in close proximity to noisy infrastructure or activities.</b></p> <p>The HS2 Phase One Environmental Statement, reports that the location of the HS2 railway line at the former HOAC facility means that the site is now not suitable for some of its coaching and camping activities, as these require tranquillity and due to the fact that there will be a maximum of 18 trains per hour<sup>14</sup> running through the site. The HS2 Environmental Statement (November 2013) states in its non-technical summary<sup>15</sup> that if the former HOAC facility continued to operate in its current location, the users will experience noise and visual effects.</p> <p>The noise and vibration of HS2, along with other railway lines, noisy infrastructure or activities could pose a safety risk for future users of the site, particularly those from SEN organisations. A noisy facility is not suitable for some students with disabilities such as Autism Spectrum Disorder (ASD), sensory processing disorder or ADHD as being located close to a noise-generating facility or activity can be highly problematic. A noisy environment can interfere with the ability to focus, listen and process information. This can be particularly challenging for students who already face difficulties with cognitive processing, speech or auditory problems.</p> <p>Publicly available sources of noise mapping data in GIS software have been used to evaluate noise constraints. Data sources include DEFRA Round 4 Strategic Noise Mapping (road traffic and railway noise)<sup>16</sup> and Heathrow Noise Contours<sup>17</sup>.</p> |

<sup>14</sup> <https://www.gov.uk/government/publications/high-speed-two-an-engine-for-growth/high-speed-two-an-engine-for-growth>

<sup>15</sup> Page 81. The HS2 Environmental Statement (November 2013)

<sup>16</sup> <https://www.gov.uk/government/publications/strategic-noise-mapping-2022>

<sup>17</sup> <https://www.heathrow.com/company/local-community/noise/data/reports>

|  |  |
|--|--|
|  | <p><u>Upper screening criteria</u> – an initial screening criterion of 55 dB <math>L_{Aeq,16hr}</math> has been adopted in relation to the main waterbody having regard to safety in respect of verbal communication from instructors etc.</p> <p>Lower screening criteria – for sites which are predominately below 55 dB <math>L_{Aeq,16hr}</math>, further consideration was given to the provision of a reasonably sized area below 50 <math>L_{Aeq,16hr}</math> for outdoor teaching and communication purposes, as well as any specific hearing-related sensitivities. Consideration has also been given to adjacent land areas however ownership and other constraints has not been taken into account.</p> <p>These criteria generally accord with the Acoustics of Schools: A Design Guide which states “noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB <math>L_{Aeq,16hr}</math>, and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB <math>L_{Aeq,16hr}</math>”.</p> <p>The Assessment has been undertaken by the Noise and Air Quality Consultants (Logika) and can be found at <b>Appendix 7</b>.</p> |
|--|--|

- 8.3 Sites have been assessed as either meeting the above criteria (green rating) or not meeting the criteria (red rating). Only sites that meet all of the criteria are taken forward to the Stage 2 Assessment.

## Stage 2 Assessment Criteria

- 8.4 In the event that the Site meets all of the Stage 1 Assessment Criteria, then it will form part of a ‘shortlist’ of sites and will be assessed as part of the Stage 2 Assessment.
- 8.5 Assessment against the Stage 2 criteria is the final stage and consists of a Red, Amber, Green (RAG) Assessment. This is an approach undertaken for ASA’s as set out in the Surrey County Council Alternative Site Assessment Guidance (2021)<sup>18</sup>. This scoring system is based on the degree of difficulty in overcoming a particular constraint by mitigation or design rather than how a constraint is measured against other constraints. The site with a high score is more appropriate than a site with a low score, however care must be taken within the interpretation of scores as the criteria are not necessarily comparable.

| Score | Interpretation  |
|-------|---|
| -1    | The site does not meet the criteria.  |
| 0     | The site does not currently meet the criteria but may be able to through mitigation and enhancements. |
| 1     | The site meets the criteria.  |

<sup>18</sup> Surrey County Council. Alternative Site Assessment Guidance (May 2021)

- 8.6 The Stage 2 Assessment Criteria are set out in **Table 6**. It consists of site security, depth, water and land quality, sailing suitability, nature conservation; and historic environment and landscape and visual impacts. The Stage 2 Assessment Criteria have been selected based on the HS2 Ltd Lake Options Report (2015) assessment criteria and the Association's requirements to operate the Proposed Development.
- 8.7 The existing or proposed provision of utilities has not been assessed as part of the Stage 2 Assessment as utility information is not publicly available. The existing provision of utilities is also not a distinguishing factor between the sites, as all sites would require substantial utility works to accommodate the Proposed Development.

**Table 6: Stage 2 Assessment Criteria**

| Criteria                      | Considerations  |
|-------------------------------|---|
| <b>Site Security</b>          | <p><b>The site must be made secure and provide exclusive use</b> of the facilities, to meet the statutory requirements of future users of the Proposed Development, such as school students and younger people from organisations.</p> <p>The Proposed Development must maintain the same levels of security as an educational establishment, due to many visitors in the week visiting from a school or similar organisation. The statutory requirements for security include the Department of Education Statutory Guidance on Keeping Children Safe in Education<sup>19</sup> for children under the age of 18.</p> <p>PRoWs should not go through the site, as this would allow access to the general public.</p> |
| <b>Depth</b>                  | <p><b>The lake must have a minimum depth of 0.9 metres.</b> The minimum depth requirement for dinghy sailing is 0.9 metres, which allows the dinghies to safely capsize without a mast or equipment getting caught on an obstacle of the lake floor.</p> <p>Dinghies used by Outdoor Activity Centres typically have a maximum draft of between 0.9m and 1.3m. On this basis, it is reasonable to assume that a minimum lake depth of 1.5m is required<sup>20</sup>.</p>  |
| <b>Water and Land Quality</b> | <p><b>The lake water must meet the minimum standards set by the Bathing Water Regulations 2013<sup>21</sup>.</b> These regulations classify bathing water as poor, sufficient, good or excellent, based on water quality samples taken throughout the year.</p> <p>Water which is exposed to harmful bacteria and viruses such as E. coli, parasites or toxic algae can cause health issues to people swimming, boating or fishing in the lake. Clean water supports</p>  |

<sup>19</sup> UK Government. Keeping children safe in education (Published March 2015. Updated in September 2024).

<sup>20</sup> Sailing Suitability Requirements Report prepared by Peter Bentley Limited (October 2024)

<sup>21</sup> <https://www.legislation.gov.uk/ukxi/2013/1675/contents/made>

|                            |  |
|----------------------------|--|
|                            | <p>healthy aquatic ecosystems and polluted water harms fish, plants and other wildlife which can ruin recreational fishing and disrupt the natural balance of the lake. Unclean water can also discourage people from using the lake for leisure which can affect the operation and viability of a facility.</p> <p><b>There must not be a risk of exposure to contaminated land (for example, asbestos) or noxious plants for future users of the Site.</b> Exposure to asbestos can lead to inhaling asbestos fibres, which can cause serious health problems.</p>   |
| <b>Sailing Suitability</b> | <p><b>The lake must provide good sailing conditions given that this is one of the key water based activities to be provided at the Proposed Development.</b></p> <p>Good wind conditions are required for sailing activities, as sailboats rely on wind as their primary source of propulsion. Lakes are smaller and more confined than seas, so consistent wind helps sailors make the most of limited manoeuvring room. Without enough wind, a sailboat can't move effectively. Too little winds can leave a boat stranded or drifting without control, while too much wind can overpower the sails and increase the risk of capsizing or damage.</p> <p>Sailing upwind requires tacking (zigzagging). This requires some skill and experience to execute reliably. Inexperienced sailors need space and time to learn this technique. For this reason, long, narrow bodies of water, especially those aligned with the prevailing wind are less suited to complete novice training than those of a circular, square or extended ellipse shape. Similarly, long narrow bodies of water surrounded by trees and buildings will suffer from poor wind conditions when the wind direction is perpendicular to the principal axis of the lake.</p> <p><b>Long-narrow bodies of water are less desirable than more open shapes.</b></p> <p>The surrounding topography, trees and buildings have a significant effect on wind flow across the lake. Tall trees, buildings and hills near the lake are detrimental to wind flow. Detailed analysis and CFD models will be required to make an accurate assessment, but a good rule of thumb is to assume reasonable wind flow outside an area contained by a 1:10 slope from the upwind obstruction i.e. 10 metre trees will affect the wind to a distance of 100m from the shore. The obstructed area is not entirely unsuitable for sailing but will have more gusty wind. Large obstructions downwind of the sailing area may also be problematic.</p> |

|  |  |
|--|--|
|  | Sites with fewer and lower buildings and trees are preferable from a sailing perspective. Lakes in deep valleys or adjacent to steep hills suffer from poor wind conditions for sailing.   |
| <b>Nature Conservation</b>                                     | <p><b>The site must be able to be developed without having a significant impact on areas of ecological sensitivity including those of national importance, i.e. Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR).</b></p> <p>Proposing a development within or adjacent to an area of ecological sensitivity may result in existing habitats being lost or fragmented. A location which has hosted a similar activity may be preferable as opposed to an undeveloped site, as the ecological resource there may already be acclimatised to some level of human activity.</p> |
| <b>Historic Environment &amp; Landscape and Visual Impacts</b> | <p><b>The construction of the Proposed Development must not result in significant harm to any built heritage on or in close proximity to the site, or any archaeological assets.</b></p> <p><b>The Proposed Development must respect the landscape character, the need to protect landscapes or designated areas of national importance and localised height restrictions.</b></p>   |

8.8 An assessment of the shortlisted sites against the Stage 2 Assessment Criteria is set out later in this report.

## 9. Identification of Alternative Sites

- 9.1 For the purposes of this ASA, an alternative site is defined as a lake within the search area which is a 20-kilometre radius from the former HOAC facility at Dews Lane. Several different methods were used to search comprehensively for the lakes:
- LB Hillingdon's online planning portal.
  - Local and Regional Planning Policy Documents including the LB Hillingdon Local Plan Part 1 (Strategic Policies) (November 2021), LB Hillingdon Local Plan Part 2 (Development Management Policies) (January 2020) and the West London Waste Plan (July 2015).
  - Third party websites such as Land Registry, Landinsight and Companies House.
  - HS2 Lake Options Report (2015).
- 9.2 Each lake within a 20-kilometre radius of the former HOAC facility has been mapped using GIS mapping which can be found at **Appendix 8**.
- 9.3 A list of the alternative sites are presented at **Table 7**, along with confirmation on which Local Planning Authority the site is located within and the distance to the former HOAC facility (kilometres).

**Table 7: List of Alternative Sites**

| Site No. | Site Name                          | Distance to the Former HOAC Facility (km) <sup>22</sup> | Local Planning Authority  |
|----------|------------------------------------|---|---|
| 1        | Dews Lane - Previous HOAC Site*    | 0.00  | London Borough of Hillingdon  |
| 2        | Savay Lake                         | 0.25  | London Borough of Hillingdon  |
| 3        | Uxbridge Golf Course**             | 0.38  | London Borough of Hillingdon  |
| 4        | Harefield Marina                   | 0.65  | London Borough of Hillingdon  |
| 5        | Korda Lake                         | 1.07  | London Borough of Hillingdon  |
| 6        | Harefield Moor                     | 1.08  | London Borough of Hillingdon  |
| 7        | Lakes South of Denham Country Park | 1.38  | Buckinghamshire Council (South Bucks)                                 |
| 8        | Broadwater Lake                    | 1.49  | London Borough of Hillingdon  |
| 9        | Tilehouse South Lake               | 2.35  | Buckinghamshire Council (South Bucks)                                 |
| 10       | Tilehouse North Lake               | 2.73  | Buckinghamshire Council (South Bucks) / Three Rivers District Council |
| 11       | Troy Lake                          | 2.83  | Three Rivers District Council   |
| 12       | Blue Circle Lake                   | 3.35  | Three Rivers District Council   |

<sup>22</sup> Distance measured to nearest water-edge.

| <b>Site No.</b> | <b>Site Name</b>                  | <b>Distance to the Former HOAC Facility (km)<sup>22</sup></b> | <b>Local Planning Authority</b>                                      |
|-----------------|-----------------------------------|---|--|
| 13              | Ruislip Lido                      | 3.60  | London Borough of Hillingdon   |
| 14              | Denham Roundabout Quarry          | 3.70  | Buckinghamshire Council (South Bucks)                                |
| 15              | Pynesfield Lake                   | 3.77  | Three Rivers District Council  |
| 16              | Lynsters Lake                     | 3.80  | Three Rivers District Council  |
| 17              | Springwell Lake                   | 4.92  | London Borough of Hillingdon   |
| 18              | Inns Lake                         | 5.10  | London Borough of Hillingdon / Three Rivers District Council         |
| 19              | Stocker's Lake                    | 5.48  | Three Rivers District Council  |
| 20              | Bury Lake                         | 5.77  | Three Rivers District Council  |
| 21              | Batchworth Lake                   | 5.85  | Three Rivers District Council  |
| 22              | Upton Lake                        | 6.20  | Buckinghamshire Council (South Bucks)                                |
| 23              | Black Park Lake                   | 6.50  | Buckinghamshire Council (South Bucks)                                |
| 24              | Farlows Lake                      | 6.68  | Buckinghamshire Council (South Bucks)                                |
| 25              | Hampermill Lake                   | 7.25  | Three Rivers District Council  |
| 26              | Thorney Weir                      | 8.57  | Buckinghamshire Council (South Bucks)                                |
| 27              | Maryfields Lake and Adjacent Lake | 8.65  | London Borough of Hillingdon / Buckinghamshire Council (South Bucks) |
| 28              | Saxon Lake                        | 9.85  | London Borough of Hillingdon   |
| 29              | Queen Mary Reservoir              | 17.61   | Spelthorne Borough Council   |
| 30              | Staines Reservoir                 | 13.93   | Spelthorne Borough Council   |
| 31              | King George IV Reservoir          | 14.18   | Spelthorne Borough Council   |
| 32              | Wraysbury Reservoir               | 12.58   | Spelthorne Borough Council   |
| 33              | The Queen Mother Reservoir        | 11.29   | Royal Borough of Windsor and Maidenhead                              |
| 34              | Bedfont Lakes                     | 15.21   | Spelthorne Borough Council / London Borough of Hounslow              |
| 35              | Taplow Lake                       | 15.79   | Buckinghamshire Council (South Bucks)                                |
| 36              | Brent Reservoir                   | 15.44   | London Borough of Brent / London Borough of Barnet                   |
| 37              | Ellis Water                       | 20.23   | Spelthorne Borough Council   |
| 38              | Big Sheepwalk & Little Sheepwalk  | 20.47   | Spelthorne Borough Council   |
| 39              | SE of Laleham Park                | 20.37   | Spelthorne Borough Council   |

| <b>Site No.</b> | <b>Site Name</b>   | <b>Distance to the Former HOAC Facility (km)<sup>22</sup></b> | <b>Local Planning Authority</b>         |
|-----------------|--|---|---|
| 40              | Penton Hook Marina   | 18.61   | Runnymede Borough Council               |
| 41              | Abbey Lake   | 19.71   | Runnymede Borough Council               |
| 42              | Fleet Lake   | 19.18   | Runnymede Borough Council               |
| 43              | Manor Lake   | 19.34   | Runnymede Borough Council               |
| 44              | St Ann's Lake  | 19.96   | Runnymede Borough Council               |
| 45              | Longside Lake  | 19.38   | Runnymede Borough Council               |
| 46              | Ash Link Nature Reserve  | 19.92   | Spelthorne Borough Council              |
| 47              | Thorpe Lea Fishery   | 18.77   | Runnymede Borough Council               |
| 48              | Thorpe Hay Meadow  | 17.78   | Runnymede Borough Council               |
| 49              | Unnamed 3 lakes grouped together                                 | 19.86   | Runnymede Borough Council               |
| 50              | Amber lakes  | 13.51   | Royal Borough of Windsor and Maidenhead |
| 51              | Lakes south of Wraysbury   | 14.83   | Royal Borough of Windsor and Maidenhead |
| 52              | Lakes southeast of M25 / A30 junction                            | 15.8  | Royal Borough of Windsor and Maidenhead |
| 53              | Lakes at Kingsmead Quarry  | 12.83   | Royal Borough of Windsor and Maidenhead |
| 54              | Balancing Reservoir – east and west                              | 13.42   | London Borough of Hounslow              |
| 55              | Hillfield Park Reservoir   | 12.53   | Hertsmere Borough Council               |
| 56              | Aldenham Reservoir   | 13.31   | Hertsmere Borough Council               |
| 57              | Lakes at Waterside Fishery                                       | 14.69   | Buckinghamshire Council (Chiltern)      |
| 58              | Shardeloes Lake  | 14.83   | Buckinghamshire Council (Chiltern)      |
| 59              | Lakes at Little Marlow Country Park                              | 17.06   | Buckinghamshire Council (Wycombe)       |
| 60              | Summerleaze Lake and Gravel pit to the North (New Denham Quarry) | 16.69   | Buckinghamshire Council (South Bucks)   |
| 61              | Bray Lake and lake to the north                                  | 16.99   | Royal Borough of Windsor and Maidenhead |
| 62              | Lakes at Liquid Leisure Wake Park                                | 13.08   | Royal Borough of Windsor and Maidenhead |



| <b>Site No.</b> | <b>Site Name</b>                                      | <b>Distance to the Former HOAC Facility (km)<sup>22</sup></b> | <b>Local Planning Authority</b>       |
|-----------------|---|---|---------------------------------------|
| 63              | Colnbrook West  | 10.66   | Slough Borough Council                |
| 64              | Orlitts Lake  | 10.32   | Slough Borough Council                |
| 65              | Old Slade (and small lake SE)                         | 9.65  | Slough Borough Council                |
| 66              | Little Britian Lake                                   | 6.43  | London Borough of Hillingdon          |
| 67              | Three lakes around Frays River                        | 7.61  | London Borough of Hillingdon          |
| 68              | Lake adjacent to grand union canal (Packet Boat Lake) | 6.83  | London Borough of Hillingdon          |
| 69              | Cowley Lake   | 6.38  | London Borough of Hillingdon          |
| 70              | Two lakes either side of the M25                      | 5.11  | Buckinghamshire Council (South Bucks) |
| 71              | Rowley Lake   | 7.34  | Buckinghamshire Council (South Bucks) |

9.4 Each site has been assessed against the Stage 1 Assessment Criteria in the first instance.

## 10. Assessment of Long-List Alternative Sites

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- 10.1 The alternative sites listed in Table 7 have been assessed against the following Stage 1 Assessment Criteria:
- Lake surface area;
  - Land surface area;
  - Accessibility;
  - Designated sites;
  - Site availability; and
  - Intersected by HS2, other railway lines or adjacent to noisy infrastructure and activities.
- 10.2 The assessment of the long-listed alternative sites is set out below at **Table 8**. As set out in Section 8, where a site passes the criteria, it is highlighted in green. Where a site does not pass the criteria, it is highlighted in red.
- 10.3 The sites which have passed all the Stage 1 Assessment Criteria have been assessed further as part of the short-list assessment against the Stage 2 Assessment Criteria.

**Table 8: Longlist Assessment**

| No. | Site Name and Grid References                         | Lake Surface Area (approximate)  | Land Surface Area (approximate)  | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|---|--|--|--|---|---|--|
| 1   | Dews Lane - Previous HOAC Site*<br><br>505317, 187927 | Following the construction of HS2, the remaining portion of the lake at Dews Lane would measure less than 10 hectares. | Following the construction of HS2, the remaining portion of the land at Dews Lane would measure at less than two hectares. | The former HOAC facility was easily accessible by vehicles, pedestrian and cycle routes.                           | HS2 Ltd have taken full possession of the Dews Lane site for the construction phase. Once the construction phase is complete, HS2 Ltd will hand back the majority of the Dews Lane site to LB Hillingdon. | The site has no international or European designations. | The site is intersected by HS2.  |
| 2   | Savay Lake<br><br>504906, 188014                      | The lake surface area measures at approximately 20 hectares.   | The land surface area measures at approximately five hectares.   | The site is accessed via a track road from Moorhall Road. The Junction visibility to the east of the existing site | The site is owned by HS2.   | The site has no international or European designations. | The site is intersected by HS2.  |

| No. | Site Name and Grid References              | Lake Surface Area (approximate)   | Land Surface Area (approximate)                              | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|--|---|---|---|--|
|     |  |   |  | access is poor as the road bends (<30m visibility). The appropriate junction visibility for the speed of the road (40mph) cannot be achieved.   |   |   |  |
| 3   | Uxbridge Golf Course<br><br>505624, 186830 | The lakes range in area from approximately 11.7 to 1.4 hectares. If combined, the lakes would result in increased flood risk. | The land surface area measures at approximately 25 hectares. | The site is accessed via The Drive to the south of the site. The Drive is a public road, which is not maintained at public expense. The Drive is restricted to access by vehicles <3.5 tonnes. On a desktop review, | Owned by the Mayor and Burgesses of the London Borough of Hillingdon. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility  | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|--|-------------------|------------------|--|
|     |                               |                                 |                                 | <p>The Drive looks narrow, so there may be limitations to providing two-way traffic and a pedestrian footpath.</p> <p>Footway provision is limited from The Drive at infrequent intervals. There are PROW footpaths passing through the site which connect Harvil Road to the Grand Union Canal Footpath.</p> <p>Bus stops and rail stations are</p> |                   |                  |  |

| No. | Site Name and Grid References          | Lake Surface Area (approximate)                                | Land Surface Area (approximate)                                 | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|--|---|--|--|---|--|
|     |  |  |   | not located within a walking distance of the site.   |  |   |  |
| 4   | Harefield Marina<br><br>505091, 188338 | The lake surface area measures at approximately 2.5 hectares.  | The land surface area measures at approximately eight hectares. | The site has good vehicular, pedestrian routes and access arrangements to the site.  | Owned by M.J. Musk Marine Sales (Harefield) Limited, a private limited company. In use as an operational marina. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 5   | Korda Lake<br><br>504520, 188649       | The lake surface area measures at approximately five hectares. | The land surface area measures at less than two hectares.       | The site has good vehicular and public transport access. But the site has no nearby footpaths, and pedestrian access is constrained due to construction. | Owned Ivydrive Development Co. Limited. Used by Denham Water Ski Club  | The site has no international or European designations. | The site is intersected by HS2.  |
| 6   | Harefield Moor                         | The lake surface area measures                                 | The land surface area measures                                  | The site has good vehicular  | In use as an aggregate site  | The site has no international or                        | The site is not intersected by   |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility  | Site Availability   | Designated Sites       | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|--|---------------------|------------------------|--|
|     | 504433, 188894                | at approximately six hectares.  | at approximately six hectares.  | and public transport access. But there are no public footpaths accessing the site. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a number of costs including administrative | (Unknown Ownership) | European designations. | HS2 or in close proximity to noisy infrastructure and activities.                |

| No. | Site Name and Grid References                            | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                 | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|---|---|--|---|--|
|     |  |   |   | fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance.   |  |   |  |
| 7   | Lakes South of Denham Country Park<br><br>504924, 186144 | The lake surface area measures at approximately six hectares. | The land surface area measures at approximately three hectares. | There are two access points to the site from Denham Court Drive. The northern access point is located on a bend and has very limited north and south junction visibility. The access further south seems suitable, although it is | Adjacent land in use by Anoopam Mission, Swaminarayan Temple. Owned by William Boyer & Sons Limited. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |



| No. | Site Name and Grid References              | Lake Surface Area (approximate)                                 | Land Surface Area (approximate)                                | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|--|--|--|---|--|
|     |  |   |  | gated and serves the Aum Crematorium.  |  |   |  |
| 8   | Broadwater Lake<br><br>504349, 189628      | The lake surface area measures at approximately 62 hectares.    | The land surface area measures at approximately five hectares. | The site has good vehicular routes to the site, pedestrian routes to the site, cycle routes to the site and access arrangements to the site. | In ownership of Lafarge Aggregates Limited. Currently in use by Broadwater Sailing Club which would be compatible with the Proposed Development. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 9   | Tilehouse South Lake<br><br>503833, 189596 | The lake surface area measures at approximately eight hectares. | The land surface area measures at less than two hectares.      | The site has good vehicular and pedestrian routes to the site. However, the site has poor public transport accessibility.                    | Owned by Ivy Drive Co. Limited. Used by Denham Water Ski Club. These uses are not compatible with the Proposed Development.                      | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References              | Lake Surface Area (approximate)                                | Land Surface Area (approximate)                           | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|--|---|---|--|---|--|
| 10  | Tilehouse North Lake<br><br>503786, 189987 | The lake surface area measures at approximately nine hectares. | The land surface area measures at less than two hectares. | The site has good vehicular access. But there are no nearby public footpaths and the public transport accessibility is poor. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a | In ownership of Denham Water Ski Club but is not used by the club. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                           | Accessibility  | Site Availability                                   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-------------------------------|--|---|--|---|---|--|
|     |                               |  |   | number of costs including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance. |   |   |  |
| 11  | Troy Lake<br>503948, 190474   | The lake surface area measures at approximately 19 hectares. | The land surface area measures at less than two hectares. | The site has good pedestrian access. However, the vehicular access is not sufficient for heavier vehicles. The site also has poor public transport accessibility.    | In ownership and used by Rickmansworth Sailing Club | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References                           | Lake Surface Area (approximate)  | Land Surface Area (approximate)                               | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|---|--|---|--|---|---|--|
| 12  | Blue Circle Lake (Troy Mill Lake)<br><br>503741, 190861 | The lake surface area measures at approximately seven hectares.          | The land surface area measures at less than two hectares.     | The site had good vehicular and pedestrian access. However, the site has poor public transport accessibility.                                | Forms part of the wider land ownership of Clancy Group, a construction company who operate on the land to the west. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 13  | Ruislip Lido<br><br>508809, 189173                      | The lake surface area measures at approximately 12 hectares.             | The land surface area measures at approximately 2.5 hectares. | The site has good vehicular routes to the site, pedestrian routes to the site, cycle routes to the site and access arrangements to the site. | Owned and managed by LB Hillingdon.   | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 14  | Denham Roundabout Quarry<br>503950, 185032              | Denham Roundabout Lake has been infilled and is therefore not available. |   |  |   |   |  |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                               | Accessibility  | Site Availability                      | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-----------------------------------|--|---|--|--|---|--|
| 15  | Pynesfield Lake<br>503671, 191233 | The lake surface area measures at approximately 19 hectares. | The land surface area measures at approximately two hectares. | Vehicular routes to the site are restricted due to a 7.5 tonne weight restriction on Coppermill Lane. There are also no pedestrian footpaths leading to the site. There is limited junction visibility to the west of the existing site access on Coppermill Lane. There is also no public transport access (bus or rail) to the site. | In ownership of Affinity Water Limited | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References       | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                               | Accessibility   | Site Availability                                   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-------------------------------------|--|---|---|---|---|--|
| 16  | Lynsters Lake<br><br>503937, 191597 | The lake surface area measures at approximately 29 hectares. | The land surface area measures at approximately six hectares. | There is a 7.5 tonne weight restriction on Coppermill Lane. There are also no pedestrian footpaths leading to the site. There is also no public transport access (bus or rail) to the site. Vehicular access would be required via Lynsters Farm access road. Access upgrades for pedestrians and vehicles would be required. | Owned by Guy's and St Thomas's Foundation and Trust | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                                | Land Surface Area (approximate)                           | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-----------------------------------|--|---|---|--|---|--|
| 17  | Springwell Lake<br>504094, 192807 | The lake surface area measures at approximately nine hectares. | The land surface area measures at less than two hectares. | Although the site has sufficient pedestrian and public transport accessibility, it has restricted vehicular accessibility. The site is accessed via a narrow bridge over the River Colne. | In ownership of Affinity Water Limited. The land to the west is currently occupied by commercial premises and yard area. The land to the south is currently occupied by commercial properties. The land to the west cannot be accessed due to the location of the River Colne. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 18  | Inns Lake<br>504208, 193456       | The lake surface area measures at                              | The land surface area measures at less than two hectares. | The site had sufficient vehicular, pedestrian and   | In ownership of Affinity Water Limited   | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to                                      |

| No. | Site Name and Grid References    | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                 | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|----------------------------------|---|---|---|---|---|--|
|     |                                  | approximately four hectares.                                  |   | public transport accessibility.   |   |   | noisy infrastructure and activities.   |
| 19  | Stocker's Lake<br>504903, 193467 | The lake surface area measures at approximately 25 hectares.  | The land surface area measures at approximately three hectares. | There is a 7.5 tonne weight restriction on Springwell Lane. Access could be provided from Stockers Farm Road, however, there is a small bridge crossing a canal also has weight restrictions. | In ownership of Affinity Water Limited. Nature Reserve managed by Herts and Middlesex Wildlife Trust. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 20  | Bury Lake<br>505268, 193812      | The lake surface area measures at approximately 8.5 hectares. | The land surface area measures at approximately six hectares.   | The site has good vehicular routes to the site, pedestrian routes to the site, cycle routes to the site and access  | In ownership of Three Rivers District Council   | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |



| No. | Site Name and Grid References                | Lake Surface Area (approximate)                                 | Land Surface Area (approximate)                               | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|---|--|---|---|--|
|     |  |   |   | <p>arrangements to the site.</p> <p>The existing access is only suitable for one-way movements.</p>              |   |   |  |
| 21  | <p>Batchworth Lake</p> <p>505651, 193995</p> | The lake surface area measures at approximately eight hectares. | The land surface area measures at less than two hectares.     | The site had good pedestrian and public transport accessibility. But the vehicular access is narrow and one-way. | In ownership of Three Rivers District Council   | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 22  | <p>Upton Lake</p> <p>500121, 184176</p>      | The lake surface area measures at approximately 3.5 hectares.   | The land surface area measures at approximately six hectares. | The site has good vehicular routes to the site, cycle routes to the site and access arrangements to the site.    | In private ownership (unknown). Planning permission has been granted for change of use from agricultural land | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                           | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-----------------------------------|---|---|---|---|---|--|
|     |                                   |   |   |   | to ancillary residential (Use Class C3) land (PL/24/3552/FA ).  |   |  |
| 23  | Black Park Lake<br>500692, 183140 | The land surface area measures at approximately 5.6 hectares. | The land surface area measures at less than two hectares. | The site has good vehicular and pedestrian routes to the site. However, the public transport accessibility is poor. | Owned by Buckinghamshire County Council. The adjacent land is used by Go Ape and there not be room to fit the Proposed Development. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 24  | Farlows Lake<br>504447, 180843    | The lake surface area measures at approximately 12 hectares.  | The land surface area measures at less than two hectares. | The site has good vehicular and pedestrian routes. However, the public transport accessibility is poor.             | Owned by Farlows Leisure LLP. The adjacent land is used by private business.  | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 25  | Hampermill Lake                   | The lake surface area measures                                | The land surface area measures                            | There is limited vehicular access   | Part owned by Affinity Water,   | The site has no international or                        | The site is not intersected by   |

| No. | Site Name and Grid References  | Lake Surface Area (approximate)                             | Land Surface Area (approximate)                                | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--------------------------------|---|--|--|--|---|--|
|     | 509661, 194164                 | at approximately 24 hectares.                               | at approximately 30 hectares.                                  | to the site. The nearest feasible vehicular access point is via Tolpits Lane which is Merchant Taylor's school private access. The site cannot be accessed via public transport. | part owned by The Masters and Wardens of the Merchant Taylors of the Fraternity of St. John Baptist in the City of London. | European designations.                                  | HS2 or in close proximity to noisy infrastructure and activities.                                |
| 26  | Thorney Weir<br>504761, 179072 | The lake surface area measures at approximately 8 hectares. | The land surface area measures at approximately five hectares. | Although the site has sufficient pedestrian and public transport accessibility, it has restricted vehicular accessibility. The site is accessed via a narrow bridge over a water | Owned by Affinity Water.   | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References                           | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                 | Accessibility  | Site Availability                     | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|---|---|---|--|---------------------------------------|---|--|
|     |   |   |   | body which forms part of Thorney Weir.   |                                       |   |  |
| 27  | Maryfields Lake and Adjacent Lake<br><br>505147, 178995 | The lake surface area measures at approximately 4.3 hectares. | The land surface area measures at approximately seven hectares. | Vehicular access to the site is from Cricketfield Road. There is a small bridge crossing. This has no specified weight restrictions, but it is very narrow. There is a secondary access from Thorney Mill Road, however the existing access has limited junction visibility to the east. There are no pedestrian | Owned by Willim Boyer & Sons Limited. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|--|
|     |                               |                                 |                                 | <p>footpaths to the site. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a number of costs including administrative fees for legal orders, construction expenses for the path itself, and</p> |                   |                  |  |

| No. | Site Name and Grid References    | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility  | Site Availability                          | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|----------------------------------|---|--|--|--|---|--|
|     |                                  |   |  | potential costs for signage and vegetation clearance. There are also limited cycle paths and public transport opportunities.   |  |   |  |
| 28  | Saxon Lake<br><br>505624, 178216 | The lake surface area measures at approximately 6.5 hectares. | The land surface area measures at approximately 35 hectares. | There is no existing access to the site. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway | In private ownership (British Airways PLC) | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References              | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|--|---|--|---|--|
|     |  |   |  | authority. This would also result in a number of costs including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance. |  |   |  |
| 29  | Queen Mary Reservoir<br><br>507122, 169709 | The lake surface area measures at approximately 288 hectares. | The land surface area measures at approximately 59 hectares. | The site has good vehicular routes to the site, cycle routes to the site and access arrangements to the site.   | Owned by Thames Water Utilities Limited. Used by Sailing Club which would be compatible with the Proposed Development. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References           | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities      |
|-----|---|---|--|---|--|---|---|
|     |   |   |  |   | The only land suitable for the Proposed Development is located to the south of the lake. This land is owned and operated by Shepperton Studios Limited and has outline planning permission for the expansion of the existing film studios (ref. 18/01212/OUT). |   |   |
| 30  | Staines Reservoir<br><br>505123, 173126 | The lake surface area measures at approximately 164 hectares. | The land surface area measures at approximately 32 hectares. | Although there are multiple accesses to the site (from London Road, Stanwell Moor Road and Town | Owned by Thames Water Utilities Limited  | The site is designated as a Ramsar Site & Special Protection Area | This Site does not align with the adopted noise criteria.<br><br>A review of Heathrow |



| No. | Site Name and Grid References                  | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability                       | Designated Sites                      | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|--|---|--|---|---|---------------------------------------|--|
|     |  |   |  | Lake), significant works to the existing accesses would be required to make it suitable for coach / minibuses and HGVs.   |   |                                       | Airport 2023 noise contours show that air noise levels reach 60 dB LAeq,16h.   |
| 31  | King George IV Reservoir<br><br>504110, 173331 | The lake surface area measures at approximately 140 hectares. | The land surface area measures at approximately 40 hectares. | The site is accessed from Stanwell Moor Road. Significant works would be required to the existing access to make it suitable for coach / minibuses and HGVs. There is no public | Owned by Thames Water Utilities Limited | Ramsar Site & Special Protection Area | This Site does not align with the adopted noise criteria.<br><br>A review of Heathrow Airport 2023 noise contours show that air noise levels reach 60 dB LAeq,16h. |

| No. | Site Name and Grid References                    | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|--|---|--|---|--|---|--|
|     |  |   |  | transport access to the site.   |  |   |  |
| 32  | Wraysbury Reservoir<br><br>502514, 174685        | The lake surface area measures at approximately 200 hectares. | The land surface area measures at approximately 60 hectares. | The existing access is from Coppermill Road. There will likely be insufficient junction visibility from the east for an intensified vehicle access point. | Owned by<br>Owned by Thames Water Utilities Limited  | The site is designated as a Ramsar Site & Special Protection Area | This Site does not align with the adopted noise criteria.<br><br>A review of Heathrow Airport 2023 noise contours show that air noise levels reach 60 dB LAeq,16h. |
| 33  | The Queen Mother Reservoir<br><br>500674, 176927 | The lake surface area measures at approximately 190 hectares. | The land surface area measures at approximately 70 hectares. | Although an existing access is already established from Horton Road for Datchet Water Sailing Club, there is no pedestrian or cycle access to             | Owned by Thames Water Utilities Limited. Used by birdwatching club & Datchet Water Sailing Club which is compatible with | The site has no international or European designations.           | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities.   |

| No. | Site Name and Grid References   | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                              | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|---------------------------------|--|--|--|---|---|--|
|     |                                 |  |  | the site. The site also has limited public transport links.  | the Proposed Development.   |   |  |
| 34  | Bedfont Lakes<br>507394, 172459 | The lake surface area measures at approximately 40 hectares. | The land surface area measures at approximately 12 hectares. | Although an existing access is already established from the site, there are no public transport options within walking distance of the site. | Owned by Heathrow Airport Limited. Within Country Park  | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities.                           |
| 35  | Taplow Lake<br>491086, 180966   | The lake surface area measures at approximately 10 hectares. | The land surface area measures at approximately 14 hectares. | The existing access from Armerden Lane is very narrow. There is also a bridge on the access and width restrictions of 13'1" wide and         | Owned by Summerleaze Limited, used by 'Meadow Adventures' Water sports which is compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the A4 and railway line the site does not align with the adopted criteria. Round 4 Strategic Noise |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                              | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|-----------------------------------|--|--|---|---|---|--|
|     |                                   |  |  | 4 metre high. There are also no existing pedestrian access routes into the site.  |   |   | Maps indicates that there is only 6.7 hectares of the site below 55 Db $L_{Aeq,16hr}$ . No part of the site is below 50 Db $L_{Aeq,16hr}$ .  |
| 36  | Brent Reservoir<br>521683, 187228 | The lake surface area measures at approximately 42 hectares. | The land surface area measures at approximately 14 hectares. | The site is accessed from Birchen Grove. The crossover access from Birchen Grove via Wembley Sailing Club is not suitable for minibuses, coaches or HGVs. There are limited public transport opportunities in | Owned by the Canal & River Trust, used by a Sailing Club which is compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M1 and A406 This site is not ideal and is subject to appreciable noise constraints.<br><br>Round 4 Strategic Noise Maps indicates that large areas of the site below 55 Db |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                 | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|-----------------------------------|--|---|--|--|---|---|
|     |                                   |  |   | walking distance of the site.  |  |   | L <sub>Aeq,16hr</sub> . Only 2% of the site is below 50 Db<br>L <sub>Aeq,16hr</sub> .   |
| 37  | Ellis Water<br><br>506460, 167549 | The lake surface area measures at approximately 36 hectares. | The land surface area measures at approximately three hectares. | There is an established access to Littleton Sailing Club from Littleton Lane, however the access is on a bend and there may be possible junction visibility issues as the access would need to be intensified for coaches, minibuses and HGVs. There are also no bus stops or railway stations located | Owned by the Civil Service Sports Council Limited. Used by Littleton Sailing Club which is compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M3 this site is not ideal and is subject to appreciable noise constraints.<br><br>Round 4 Strategic Noise Maps indicates that large areas of the site exceeds 55 Db<br>L <sub>Aeq,16hr</sub> . No part of the site is below the lower screening criteria. |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|--|
|     |                               |                                 |                                 | <p>within walking distance of the site, or any footways or pedestrian access is available from Littleton Lane. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a number of costs</p> |                   |                  |  |

| No. | Site Name and Grid References                      | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|--|--|--|---|--|---|---|
|     |  |  |  | including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance.  |  |   |   |
| 38  | Big Sheepwalk & Little Sheepwalk<br>506815, 167457 | The lake surface area measures at approximately 10 hectares. | The land surface area measures at approximately five hectares. | The existing access has a 7'0" vehicle width restriction from the north of Sheep Walk. South of Sheep Walk is unrestricted. Footpath access from Fairview Drive to the north leading to the surrounding | Owned by Surrey County Council. Used by Civil Service Angling Society and Littleton Sailing Club which are compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M3 This site is not ideal and is subject to appreciable noise constraints.<br><br>Round 4 Strategic Noise Maps indicates that large areas of the site |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities          |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|---|
|     |                               |                                 |                                 | bodies of water. No pedestrian access is located from Sheep Walk. There are also limited footways on Sheep Walk with no existing crossing points. Extensive works from the private access from Sheep Walk would be required to make the access suitable for minibuses, coaches and HGVs. There is also no railway access within walking distance to the site. |                   |                  | exceeds 55 Db $L_{Aeq,16hr}$ . No part of the site is below the lower screening criteria. |



| No. | Site Name and Grid References            | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                               | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|--|--|---|--|--|---|--|
| 39  | SE of Laleham Park<br><br>505538, 167510 | The lake surface area measures at approximately 12 hectares. | The land surface area measures at approximately two hectares. | There are 7.5 tonne weight restrictions on Thames Side, leading from Chertsey Bridge Road. Extensive works would be required to the existing access to make the access suitable for minibuses / coaches / and other heavier vehicles. There is no pedestrian access to the site and no public transport options within walking distance of the site. There may be the opportunity to provide a | Owned by Brett Aggregates Limited. Used by Surrey Canoe Club & Spelthorne Waterski Club. This is not compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M3 this site is not ideal and is subject to appreciable noise constraints.<br><br>Round 4 Strategic Noise Maps indicates that large areas of the site exceeds 55 Db $L_{Aeq,16hr}$ . Only 9% of the area below the screening criteria is also below 50 Db $L_{Aeq,16hr}$ . |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|--|
|     |                               |                                 |                                 | public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a number of costs including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance. |                   |                  |  |

| No. | Site Name and Grid References            | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|--|--|---|---|---|--|
| 40  | Penton Hook Marina<br><br>504030, 169179 | The lake surface area measures at approximately 15 hectares. | The land surface area measures at approximately five hectares. | The site has good vehicular routes to the site, cycle routes to the site and access arrangements to the site. | Penton Hook Marina is an operational marina. The lake size is not of a sufficient size or shape for water activities to take place in tandem with the existing yacht club and boat parking. This would pose a safety issue given the operational nature of the existing site. An image of the Site is appended at <b>Appendix 9</b> . | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 41  | Abbey Lake<br><br>503815, 168101         | The lake surface area measures at                            | The land surface area measures at                              | Access to the site is via Thorpe Park Drive / Thorpe  | Owned by City Place Nominees Limited. Used by LBD wake  | The site has no international or European designations. | Due to its proximity to the M3 this site is not ideal and is                                     |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility  | Site Availability  | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|-------------------------------|---------------------------------|---------------------------------|--|--|------------------|--|
|     |                               | approximately 14 hectares.      | approximately 0.8 hectares.     | Park Car Park. This is not suitable for the proposed development, as there may be long queues at peak times of the day (for example, the morning and afternoon when people are visiting the theme park). There is also no railway access in close proximity to the site. | school & Thorpe Park. These uses are not compatible with the Proposed Development. |                  | <p>subject to appreciable noise constraints.</p> <p>Round 4 Strategic Noise Maps indicates that large areas of the site exceeds 55 Db <math>L_{Aeq,16hr}</math>. Only 3% of the area below the screening criteria is also below 50 Db <math>L_{Aeq,16hr}</math>. Noise from Thorpe Park may also be a consideration, which is not included in the noise mapping.</p> |

| No. | Site Name and Grid References    | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|----------------------------------|--|--|---|---|---|--|
|     |                                  |  |  |   |   |   |  |
| 42  | Fleet Lake<br><br>503481, 168669 | The lake surface area measures at approximately 12 hectares. | The land surface area measures at approximately four hectares. | Access to the site is via Thorpe Park Drive / Thorpe Park Car Park. This is not suitable for the proposed development, as there may be long queues at peak times of the day (for example, the morning and afternoon when people are visiting the theme park). An alternative access from Thorpe Park goods entrance | Owned by City Place Nominees Limited. Adjacent to Thorpe Park | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. Noise from Thorpe Park may also be a consideration however this is not included on the noise mapping. |

| No. | Site Name and Grid References | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|-------------------------------|--|--|---|---|---|--|
|     |                               |  |  | would not be viable as this is private and used by Thorpe Park. There is also no railway access in close proximity to the site.   |   |   |  |
| 43  | Manor Lake<br>502857, 168525  | The lake surface area measures at approximately 16 hectares. | The land surface area measures at approximately four hectares. | Access to the site is via Thorpe Park goods entrance. This is not suitable for the proposed development, as it is a private access and used by Thorpe Park. There is also limited pedestrian and cycle access to the site. There is | Owned by City Place Nominees Limited. Adjacent to Thorpe Park | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. Noise from Thorpe Park may also be a consideration however this is not included on the noise mapping. |

| No. | Site Name and Grid References       | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                                | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|-------------------------------------|--|--|--|--|---|--|
|     |                                     |  |  | no railway access close to the site.   |  |   |  |
| 44  | St Ann's Lake<br><br>502819, 168149 | The lake surface area measures at approximately 45 hectares. | The land surface area measures at approximately four hectares. | Although there is an established existing access, there are no cycle routes to the site. The site is also not located in close proximity to a bus or railway station. There is limited pedestrian access. There is an existing pedestrian access but this is narrow and would be unsuitable. | Owned by John Battleday Waterski (Holdings) Limited. Used by Thorpe Park – Aqua Park & Wakeboard & Waterskiing | The site is designated as a Ramsar Site & Special Protection Area | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. Noise from Thorpe Park may also be a consideration however this is not included on the noise mapping. |

| No. | Site Name and Grid References             | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|---|---|--|---|---|---|---|
| 45  | Longside Lake<br>501407, 168611           | The lake surface area measures at approximately 15 hectares.  | The land surface area measures at approximately nine hectares. | There is a 2.1 metre height restriction at the existing access. There is limited pedestrian access to the lake. There are some footpaths but these are narrow and would be unsuitable. The site cannot be accessed by public transport. | Owned by Tarmac Aggregates Limited. Used by Longside Lake Water sports & CJM Ski & Wake. These uses are not compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M25 the site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates that large areas of the site exceeds 55 Db $L_{Aeq,16hr}$ . There are no areas below 50 Db $L_{Aeq,16hr}$ . |
| 46  | Ash Link Nature Reserve<br>507841, 168388 | The lake surface area measures at approximately 5.6 hectares. | The land surface area measures at approximately 42 hectares.   | The site has good vehicular, pedestrian and public transport accessibility.   | Ownership unknown. Managed by Spelthorne Natural History Society in partnership   | The site has no international or European designations. | Due to its proximity to the M3 the site is not ideal and is subject to appreciable  |



| No. | Site Name and Grid References            | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                | Accessibility   | Site Availability                                     | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|--|---|--|---|---|---|--|
|     |  |   |  |   | with Spelthorne Council                               |   | noise constraints. Round 4 Strategic Noise Maps indicates that only 4.8 hectares of the site is below 55 dB $L_{Aeq,16hr}$ . 32% of the screening criterion is also below 50 dB $L_{Aeq,16hr}$ , however there are some pockets to the west. |
| 47  | Thorpe Lea Fishery<br><br>501867, 169789 | The lake surface area measures at approximately 6.2 hectares. | The land surface area measures at approximately five hectares. | The site has good vehicular, pedestrian and public transport accessibility. | Owned by HT. Mason Limited. In use as active fishery. | The site has no international or European designations. | Due to its proximity to the M25 The site does not align with the adopted criteria. Round 4   |

| No. | Site Name and Grid References           | Lake Surface Area (approximate)                               | Land Surface Area (approximate)  | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|---|---|--|---|--|---|---|
|     |   |   |  |   |  |   | Strategic Noise Maps indicates that the entirety of the site exceeds 55 Db $L_{Aeq,16hr}$ .   |
| 48  | Thorpe Hay Meadow<br><br>502591, 170207 | The lake surface area measures at approximately 6.4 hectares. | The land surface area measures at approximately 2.5 hectares but is significantly vegetated. | The site has good vehicular, pedestrian and public transport accessibility. | Owned by Brett Aggregates Limited. Used by Embryo Angling which is compatible with the Proposed Development. | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates that only small areas of the site is below 50 dB $L_{Aeq,16hr}$ . Following a review of Heathrow 2023 noise contours air noise levels reach 54 dB $L_{Aeq,16hr}$ based on average modal |

| No. | Site Name and Grid References                                 | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                              | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|---|--|--|---|---|---|---|
|     |   |  |  |   |   |   | split contours, 54 dB $L_{Aeq,16h}$ during westerly operations.   |
| 49  | <p>Unnamed 3 lakes grouped together</p> <p>504178, 167838</p> | The lake surface area measures at approximately 19 hectares. | The land surface area measures at approximately 80 hectares. | There are two bridges at the existing access which may not be suitable for minibuses / coaches / HGVs. The access is also in private ownership. There is limited pedestrian access to the lake. Monks Walk Lake is located to the south of the lake but is narrow and would be unsuitable for | Part owned by Affinity Water Limited and part owned by City Place Nominees Limited. | The site has no international or European designations. | Due to its proximity to the M3 the site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates that the entirety of the site exceeds 55 dB $L_{Aeq,16hr}$ . |

| No. | Site Name and Grid References | Lake Surface Area (approximate)   | Land Surface Area (approximate)                               | Accessibility   | Site Availability   | Designated Sites                      | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|-------------------------------|---|---|---|---|---------------------------------------|---|
|     |                               |   |   | pedestrian access to the site. There are also no bus stops or railway stations in walking distance to the site. |   |                                       |   |
| 50  | Amber lakes<br>500479, 174648 | The lake surface area measures at approximately 36 hectares (Divided by islands). | The land surface area measures at approximately 1.5 hectares. | The site has good vehicular, pedestrian and public transport accessibility.                                     | Owned by Favermead Holdings Limited. Used by Amber Lodge – private nature reserve | Ramsar Site & Special Protection Area | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates that only small areas of the site exceeds 55 dB $L_{Aeq,16hr}$ . 93% of the area below the screening criterion is also below 50 dB $L_{Aeq,16hr}$ . Following a review of |

| No. | Site Name and Grid References                  | Lake Surface Area (approximate)   | Land Surface Area (approximate)                              | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|--|---|--|--|---|---|---|
|     |  |   |  |  |   |   | Heathrow 2023 noise contours air noise levels reach 60 dB $L_{Aeq,16hr}$ based on average modal split contours, 60 dB $L_{Aeq,16h}$ during westerly operations.   |
| 51  | Lakes south of Wraysbury<br><br>501109, 173711 | The lake surface area measures at approximately 55 hectares (Divided by islands). | The land surface area measures at approximately 40 hectares. | There is limited pedestrian access and cycle access to the site. There is no railway access in walking distance to the site. | Part owned by Favermead Holdings Limited, part owned by Affinity Water. Used by Silver Wing Sailing Club which is compatible with the Proposed Development. | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates that only small areas of the site exceeds 55 dB $L_{Aeq,16hr}$ . 28% of the area below the screening criterion is also below 50 dB $L_{Aeq,16hr}$ . |

| No. | Site Name and Grid References                               | Lake Surface Area (approximate)   | Land Surface Area (approximate)                               | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|---|---|---|---|---|---|---|
|     |   |   |   |   |   |   | Following a review of Heathrow 2023 noise contours air noise levels reach 60 dB $L_{Aeq,16hr}$ based on average modal split contours, 60 dB $L_{Aeq,16h}$ during westerly operations. |
| 52  | Lakes southeast of M25 / A30 junction<br><br>502372, 172188 | The lake surface area measures at approximately nine hectares (divided by islands). | The land surface area measures at approximately 1.5 hectares. | The site has good pedestrian and public transport accessibility. But the site has no current sufficient vehicular access. | Part owned by Affinity Water and part owned by Brett Aggregates Limited | The site has no international or European designations. | Due to its proximity to the M25 The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates the entirety of the site exceeds 55 dB $L_{Aeq,16hr}$ .     |

| No. | Site Name and Grid References                   | Lake Surface Area (approximate)   | Land Surface Area (approximate)                               | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|---|---|---|---|--|---|--|
|     |   |   |   |   |  |   | Following a review of Heathrow 2023 noise contours air noise levels reach 54 dB $L_{Aeq,16hr}$ based on average modal split contours, 54 dB $L_{Aeq,16h}$ during westerly operations.    |
| 53  | Lakes at Kingsmead Quarry<br><br>501693, 175288 | The lake surface area measures at approximately 65 hectares (divided by islands). | The land surface area measures at approximately two hectares. | There is poor pedestrian access to the lake. Footpaths provide access within the surrounding lake area to the west, but there is no access to the lake itself. No suitable pedestrian | Part-owned by Favermead Holdings Limited, part owned by Cemex UK Operations Limited. Used by Kingsmead Quarry. | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates no area of the site is below 50 dB $L_{Aeq,16hr}$ .<br><br>Following a review of Heathrow 2023 |

| No. | Site Name and Grid References                                    | Lake Surface Area (approximate)                             | Land Surface Area (approximate)                               | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|--|---|---|--|--|---|---|
|     |  |   |   | <p>routes from the quarry are available. There are also limited cycle routes to the site.</p> <p>Vehicular access would be from Stanwell Road via the quarry access. This access would be unsuitable for the Proposed Development.</p> <p>There is no rail access within walking distance of the site.</p> |  |   | <p>noise contours</p> <p>air noise levels reach 60 dB <math>L_{Aeq,16hr}</math> based on average modal split contours, 60 dB <math>L_{Aeq,16h}</math> during westerly operations.</p> |
| 54  | <p>Balancing Reservoir – east and west</p> <p>510516, 175340</p> | The lake surface area measures at approximately 10 hectares | The land surface area measures at approximately 0.2 hectares. | The site has good public transport accessibility. However, the current   | Owned by Heathrow Airport. Used as Water Treatment Plant | The site has no international or European designations. | <p>The site does not align with the adopted criteria.</p> <p>Round 4 Strategic Noise</p>  |



| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|--|
|     |                               | (divided by two).               |                                 | vehicular access at the southern lake is too narrow. There are also no existing pedestrian routes to the site. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also result in a number of costs |                   |                  | <p>Maps indicates that only 4.9ha of the site is below 55 dB <math>L_{Aeq,16hr}</math>. There is no area below 50 dB <math>L_{Aeq,16hr}</math>.</p> <p>Following a review of Heathrow 2023 noise contours, air noise levels reach 66 dB <math>L_{Aeq,16hr}</math> based on average modal split contours, 66 dB <math>L_{Aeq,16hr}</math> during westerly operations.</p> |

| No. | Site Name and Grid References                  | Lake Surface Area (approximate)   | Land Surface Area (approximate)                                 | Accessibility  | Site Availability                         | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|--|---|---|--|---|---|---|
|     |  |   |   | including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance.                                   |   |   |   |
| 55  | Hillfield Park Reservoir<br><br>515718, 195930 | The lake surface area measures at approximately 42 hectares (divided by two). | The land surface area measures at approximately seven hectares. | There is limited footways within the vicinity of the site to provide appropriate pedestrian access. There is a public footpath located to the north of the site, however this does not | In ownership by of Affinity Water Limited | The site has no international or European designations. | Due to its proximity to the M1 the site is not ideal and is subject to appreciable noise constraints.<br><br>Round 4 Strategic Noise Maps indicates an appreciable area of the site |

| No. | Site Name and Grid References | Lake Surface Area (approximate) | Land Surface Area (approximate) | Accessibility   | Site Availability | Designated Sites | Intersected by HS2, or in close proximity to noisy infrastructure and activities |
|-----|-------------------------------|---------------------------------|---------------------------------|---|-------------------|------------------|--|
|     |                               |                                 |                                 | seem to provide access to the reservoir. There are also limited cycle paths to the site. Access from Hogg Lane to the east of the reservoir appears to have poor junction visibility. There is a potential access point from Hillfield Lane but extensive works may be required to enable minibuses / coach / HGV access. There are no bus stops or railway stations located within walking |                   |                  | exceeds 55 dB $L_{Aeq,16hr}$ . There is no area below 50 dB $L_{Aeq,16hr}$ .     |

| No. | Site Name and Grid References                    | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                               | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|---|---|---|---|--|
|     |  |   |   | distance of the site.   |   |   |  |
| 56  | Aldenham Reservoir<br><br>516980, 195536         | The lake surface area measures at approximately 18 hectares.  | The land surface area measures at approximately 15 hectares.  | There is poor junction visibility from the site access junction from Aldenham Road and Reservoir Road. There are limited cycle routes to the site and no bus stops or railway stations located within walking distance of the site. | Owned by Jewel of Hertsmere Limited                                       | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 57  | Lakes at Waterside Fishery<br><br>497002, 200280 | The lake surface area measures at approximately 2.4 hectares. | The land surface area measures at approximately 0.3 hectares. | The site has good pedestrian and public transport accessibility. However, there is no current   | Unknown owner. Used by Waterside Fishery which is not compatible with the | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References     | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability     | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|-----------------------------------|---|--|---|-----------------------|---|--|
|     |                                   |   |  | vehicular access to the site.   | Proposed Development. |   |  |
| 58  | Shardeloes Lake<br>494319, 198049 | The lake surface area measures at approximately 6.6 hectares. | The land surface area measures at approximately 45 hectares. | There is no current vehicular access and the pedestrian transport accessibility is poor. There may be the opportunity to provide a public footpath around the perimeter of the site, however this would require agreement between the landowner(s) and the local highway authority. This would also | Unknown owner         | The site has no international or European designations. | The site is Not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References                             | Lake Surface Area (approximate)   | Land Surface Area (approximate)                              | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|---|---|--|--|--|---|--|
|     |   |   |  | result in a number of costs including administrative fees for legal orders, construction expenses for the path itself, and potential costs for signage and vegetation clearance. |  |   |  |
| 59  | Lakes at Little Marlow Country Park<br><br>487228, 187127 | The lake surface area measures at approximately 57 hectares (divided by embankments). | The land surface area measures at approximately 50 hectares. | There is an established access to the lake from Westhorpe Farm Lane, however it is unclear on the sustainability of the road for minibuses / coaches / HGVs.                     | Owned by Tarmac Aggregates Limited. Used by Westhorpe Water Sports Club. Includes powerboats which are not compatible with the Proposed Development. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References                              | Lake Surface Area (approximate)                              | Land Surface Area (approximate)                              | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|--|--|--|---|---|--|
|     |  |  |  | There is also poor pedestrian access to the lake and no footway provision on Westthorpe Farm Lane. There are also no railway stations located within walking distance of the site. |   |   |  |
| 60  | Summerleaze Lake (New Denham Quarry)<br><br>504715, 184300 | The lake surface area measures at approximately 18 hectares. | The land surface area measures at approximately 68 hectares. | There is a private road access to the lake via Knighton-Way Lane. There are options to upgrade the access as demonstrated through recent   | Owned by Summerleaze Limited. In operation at Quarry. Operations expected to be completed by 2028/29. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References                           | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                | Accessibility  | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities   |
|-----|---|---|--|--|---|---|--|
|     |   |   |  | planning history at the site.  |   |   |  |
| 61  | Bray Lake and lake to the north<br><br>490781, 178619   | The lake surface area measures at approximately 25 hectares.  | The land surface area measures at approximately nine hectares. | The access to the lake is from Monkey Island to the north. The access is narrow and therefore passing places have to be used, which is not acceptable for coaches / HGVs / minibuses. There is no railway station in walking distance of the site. | Owned by Summerlease Limited. Used by Water sports and Open Water Swimming which could be compatible with the Proposed Development. | The site has no international or European designations. | Due to its proximity to the M4 the site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates a large area of the site exceeds 55 dB $L_{Aeq,16hr}$ . There is no area below 50 dB $L_{Aeq,16hr}$ . |
| 62  | Lakes at Liquid Leisure Wake Park<br><br>500044, 175893 | The lake surface area measures at approximately 9.5 hectares. | The land surface area measures at approximately 1.5 hectares.  | The site has good vehicular, pedestrian and public transport accessibility.  | Owned by Horton Leisure Limited. Used by Liquid Leisure Wake & Aqua Park which is not   | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicates no area of the   |



| No. | Site Name and Grid References    | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                                 | Accessibility   | Site Availability                           | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|----------------------------------|---|---|---|---|---|---|
|     |                                  |   |   |   | compatible with the Proposed Development.   |   | <p>site exceeds 55 dB <math>L_{Aeq,16hr}</math>.</p> <p>Following a review of Heathrow 2023 noise contours air noise levels reach 60 dB <math>L_{Aeq,16hr}</math> based on average modal split contours, 60 dB <math>L_{Aeq,16h}</math> during westerly operations.</p> |
| 63  | Colnbrook West<br>503706, 177361 | The lake surface area measures at approximately 1.8 hectares. | The land surface area measures at approximately three hectares. | The site has good vehicular routes to the site, cycle routes to the site and access arrangements to the site. | Owned by Goodman Colnbrook (Jersey) Limited | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicate a large area of the site exceeds 55 dB $L_{Aeq,16hr}$ .  |

| No. | Site Name and Grid References  | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|--------------------------------|---|--|---|---|---|---|
|     |                                |   |  |   |   |   | <p>There is no area below 50 dB <math>L_{Aeq,16hr}</math>.</p> <p>Following a review of Heathrow 2023 noise contours air noise levels reach 60 dB <math>L_{Aeq,16hr}</math> based on average modal split contours, 60 dB <math>L_{Aeq,16h}</math> during westerly operations.</p> |
| 64  | Orlitts Lake<br>503879, 177641 | The lake surface area measures at approximately 3.6 hectares. | The land surface area measures at approximately 40 hectares. | The site has good vehicular, pedestrian and public transport accessibility. | Owned by Grundon Sand & Gravel Limited. Contains a Visitor Centre / Educational Facility which could be compatible with | The site has no international or European designations. | The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicate a large area of the site exceeds 55 dB $L_{Aeq,16hr}$ .  |

| No. | Site Name and Grid References                       | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                               | Accessibility   | Site Availability                           | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities  |
|-----|---|---|---|---|---|---|---|
|     |   |   |   |   | the Proposed Development.                   |   | There is no area below 50 dB $L_{Aeq,16hr}$ . Following a review of Heathrow 2023 noise contours air noise levels reach 60 dB $L_{Aeq,16hr}$ based on average modal split contours, 60 dB $L_{Aeq,16h}$ during westerly operations. |
| 65  | Old Slade (and small lake SE)<br><br>503987, 178171 | The lake surface area measures at approximately 9.5 hectares. | The land surface area measures at approximately 0.5 hectares. | The site has good vehicular, pedestrian and public transport accessibility. | Owned by Goodman Colnbrook (Jersey) Limited | The site has no international or European designations. | Due to its proximity to the M4. The site does not align with the adopted criteria. Round 4 Strategic Noise Maps indicate the entirety of  |

| No. | Site Name and Grid References                        | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                               | Accessibility   | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                 |
|-----|--|---|---|---|--|---|--|
|     |  |   |   |   |  |   | the site exceeds 55 dB $L_{Aeq,16hr}$ .  |
| 66  | Little Britian Lake<br><br>504888, 181254            | The lake surface area measures at approximately 4.2 hectares. | The land surface area measures at approximately 26 hectares.  | The lake has good pedestrian and public transport accessibility. However, the vehicular access is not sufficient as the Old Mill Lane has a weight limit of 7.5 tonnes. | In ownership of LB Hillingdon.                                 | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |
| 67  | Three lakes around Frays River<br><br>505357, 180723 | The lake surface area measures at approximately 1.3 hectares. | The land surface area measures at approximately 0.3 hectares. | The site has good vehicular and pedestrian access. However, the site poor public transport accessibility.   | Owned by Fair Acre Investments Limited. Used by Lizard Fishery | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

| No. | Site Name and Grid References   | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                               | Accessibility  | Site Availability  | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities                           |
|-----|---|---|---|--|--|---|--|
| 68  | Lake adjacent to grand union canal (Packet Boat Lake)<br><br>505415, 181056 | The lake surface area measures at approximately 1.6 hectares. | The land surface area measures at approximately 0.2 hectares. | The site has good vehicular, pedestrian and public transport accessibility.  | Packet Boat Waterside & Marina is an operational marina. Owned by Aquavista Watersides Ltd.      | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities.           |
| 69  | Cowley Lake<br><br>505133, 181467   | The lake surface area measures at approximately 6.4 hectares. | The land surface area measures at approximately 0.2 hectares. | The site has good pedestrian and public transport accessibility. However, there is no existing vehicular access to the site. | Unknown ownership. Used by Angling Club which could be compatible with the Proposed Development. | The site has no international or European designations. | The site is not intersected by HS2 or in close proximity to noisy infrastructure and activities.           |
| 70  | Two lakes either side of the M25<br><br>504280, 182804                      | The lake surface area measures at approximately 6.6 hectares. | The land surface area measures at approximately 50 hectares.  | The site has good pedestrian and public transport accessibility. However, there is no current                                | Part owned by Woodlands Park Property Limited and part owned by Tidewater International          | The site has no international or European designations. | Due to its proximity to the M25 the site does not align with the adopted criteria. Round 4 Strategic Noise |

| No. | Site Name and Grid References | Lake Surface Area (approximate)                               | Land Surface Area (approximate)                              | Accessibility   | Site Availability   | Designated Sites  | Intersected by HS2, or in close proximity to noisy infrastructure and activities     |
|-----|-------------------------------|---|--|---|---|---|--|
|     |                               |   |  | vehicular access to the site.   | Investments Limited   |   | Maps indicate the entirety of the site exceeds 55 dB $L_{Aeq,16hr}$ .                |
| 71  | Rowley Lake<br>500295, 182493 | The lake surface area measures at approximately 1.3 hectares. | The land surface area measures at approximately 12 hectares. | The site has good pedestrian accessibility via existing pathways. However, there is no current vehicular access and the public transport accessibility is poor. | Owned by Buckinghamshire Council. Used by Angling Club which could be compatible with the Proposed Development. | The site has no international or European designations. | Not intersected by HS2 or in close proximity to noisy infrastructure and activities. |

# 11. Assessment of Shortlisted Sites

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11.1 The following sites have passed the long-list assessment and are therefore assessed as part of the short-list assessment.

- Site 8 – Broadwater Lake
- Site 13 – Ruislip Lido
- Site 20 – Bury Lake
- Site 56 – Aldenham Reservoir
- Site 60 – Denham Quarry (also known as Summerleaze Lake and New Denham Quarry)

11.2 Each lake has been assessed against the following Stage 2 Assessment Criteria:

- Site Security
- Depth
- Water and Land Quality
- Sailing Suitability
- Nature Conservation
- Historic Environment and Landscape and Visual Impacts

11.3 Detail on the site's location and description, including previous and existing uses is also provided for context.

## 12. Shortlist Assessment: Broadwater Lake

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### Site Location & Description

- 12.1 Broadwater Lake is located at Moorhall Road, Harefield, Uxbridge, UB9 6PE. The site is located in the administrative boundary of LB Hillingdon. The site is owned by LB Hillingdon.
- 12.2 The majority of the site is owned by Tarmac Aggregates Limited. HS2 Ltd own a portion of the lake under CPO rights.
- 12.3 The site is located approximately five kilometres north of Uxbridge town centre, within the Colne Valley Regional Park. South Harefield village lies to the east of the site, immediately beyond the Grand Union Canal. The site extends to approximately 80 hectares.
- 12.4 The southernmost part of the site is bound by the Moorhall Road and further beyond is The River Garden Pub. The east of the site is bound by the Grand Union Canal and beyond that are residential properties. An aggregate processing, storage and distribution centre is located to the south of the site. To the west of the site is Tilehouse South Lake which is occupied by Denham Ski Club. Further beyond Tilehouse South Lake is the HS2 viaduct.
- 12.5 The site is surrounded by medium sized trees and lies at the bottom of a wide, shallow valley with open land on all sides.
- 12.6 A land peninsula ('the peninsula') is located to the south of the lake and extends to approximately 5.9 hectares.
- 12.7 Broadwater Lake measures at approximately 62 hectares. It is the largest of four lakes within the Mid Colne Valley Site of Special Scientific Interest (SSSI). Within the lake there are a number of small islands bordered by trees and scrub.
- 12.8 The site is within the Metropolitan Green Belt.
- 12.9 A planning application (ref. 2382/APP/2006/1581) was submitted to LB Hillingdon in May 2006 by the Herts and Middlesex Wildlife Trust for habitat enhancement works to the islands within the lake. The application related to the modification of four existing islands (totalling approximately 11,350 square metres) to create wetland habitat (reed bed and wet grassland). The covering letter submitted with the planning application confirms that at the time of submission, all four islands had self-sown wetland tree species typical of gravel pit habitats (primarily Alder and willow species established since the mineral workings ceased in 1985).
- 12.10 The submission also stated that the lake has an abundant waterside tree establishment of this type, but lacks the habitat proposed which will add significantly to habitat diversity and which target BAP species such as Bittern, Otter and Water Vole. The project would have resulted in the removal of trees and the level down of the islands to water level or just below. Two of the islands would have been graded and planted with reed, whilst the remaining two would be graded and sown to form wet grassland. The application was withdrawn in July 2006, for reasons which are unknown.



## Previous & Existing Use

- 12.11 The site was previously in use as a mineral extraction facility in the Colne Valley. The lake was created after the site was used as a quarry for gravel extraction between the 1960s and the 1980s. The site was also used for the production of ready mixed asphalt and concrete. The site was also used for the dumping of asphalt, concrete and inert construction waste.
- 12.12 The site was also previously used for the maintenance of HGVs and quarry equipment.
- 12.13 The land peninsula was formerly used as a gravel washing, sorting, storage and processing plant with a silt lagoon, peninsula edges and small areas of remaining natural ground which have colonised with native broadleaf woodland, comprised of pioneer and wetland species (alder, silver birch and willows).
- 12.14 Broadwater Sailing Club (BSC) is a membership only club who currently operate from a clubhouse at the northern part of the site. BSC comprises approximately 240 family and junior members<sup>23</sup> who use the lake seven days a week (in the evening in the summer months and the mornings in the winter months). Sailing regattas are held on Sundays throughout the year and an additional six are held on various Saturdays.
- 12.15 Sailing is open to all members, seven days a week. This enables members ranging from casual cruisers to serious racers to co-exist without problems. BSC's website states that this flexibility is the secret to the Club's continued success and explains why several clubs with dwindling numbers have merged with the club in recent years. The lake is suitable for dinghies up to about 16 feet. BSC encourage members to sail their own boats. There are also boats which can be used by members. There is also a 40 hp fast safety boat and two further safety boats for use, where required.
- 12.16 Racing takes place through the year on Sunday mornings and on Wednesday evenings during the summer months (May to August). On Sunday mornings there are two races, pursuit and handicap and on Wednesdays, a pursuit race, with typically 30-35 boats on the water. A number of special annual events are also organised. BSC also run a Junior Sailing Programme designed for children in the age range of five to 16 years. The Junior Sailing Programme runs from March to September, with sessions taking place on a Saturday afternoon. There is also a supervised "Fun Week" at the start of the school holidays.
- 12.17 BSC's clubhouse has a shaded veranda and is equipped with a modern viewing gallery, a heated lounge area, heated changing rooms, toilets and showers. A Portakabin provides an "overflow" changing room which is also equipped with a toilet, washing facilities and shower. Next to the clubhouse there is a patio with picnic tables.
- 12.18 Broadwater Lake is used for angling by the Gerrards Cross and Uxbridge Angling Society.

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<sup>23</sup> <https://broadwatersc.org.uk/about/>

## Short-list Assessment

12.19 A full RAG review is set out at **Table 9**.

**Table 9: RAG review of Broadwater Lake**

| Requirement            | Detail  | Criteria Met (RAG Rating) |
|------------------------|---|---------------------------|
| Security               | The site can be secured and used solely by the users of the Proposed Development and BSC. The Angling Society would need to notify the Facility Manager of their attendance at the site to ensure that numbers are managed and safeguarding can adhere to. Further details would be provided in a future detailed Operational Management Plan which could be secured as a pre-operation condition.  | +1                        |
| Depth                  | The average depth is over 2 metres. Minor dredging works in localised areas is required in areas which have been identified as shallower in the bathymetric survey. A copy of this survey is at <b>Appendix 10</b> .  | 0                         |
| Water and Land Quality | <p>LB Hillingdon have collected water quality data from seven sample locations around Broadwater Lake across the period 12th November 2024 to 10th June 2025, on a monthly basis. The main purpose for the surface water quality testing was to assess the suitability of the surface water within Broadwater Lake for swimming and boating for children. This surface water sampling is proposed to continue on a monthly basis. The surface water samples collected have been screened against Freshwater Environmental Quality Standards (EQS) for ammoniacal nitrogen, nitrate, and phosphate. A total of 48 no. samples were collected and analysed for nitrate as N concentrations. Screening of the laboratory data has not indicated any exceedances of the nitrate as N Freshwater EQS of 50mg/l. The sampling totalled 48 no. samples tested for phosphate (Total and Ortho). Screening of the laboratory data against the updated recommendations of phosphorus standards for rivers (August 2013) has indicated that all sample concentrations are in exceedance of the 0.035mg/l concentration set out for 'Good' water quality status. A copy of this survey can be found at <b>Appendix 11</b>.</p> <p>A Phase I Geoenvironmental Assessment and Phase II Site Investigation Report were submitted with the Planning Application in 2023 (Appendix 9.2: Phase 1 Geo-environmental Assessment and Appendix 9.3: Geo-Integrity Phase II Geo-Environmental Site Investigation September 2023). The Phase II Assessment encountered made ground materials.</p> | +1                        |

| Requirement                               | Detail   | Criteria Met (RAG Rating) |
|---|--|---------------------------|
|   | <p>Correspondence with LBH has indicated the inclusion of standard contaminated land conditions that are to be progressed during the planning process. These conditions are likely to include additional Phased Site Investigation Works.</p> <p>Historic regulated off-Site landfill has been considered within this assessment, and measures have been identified and set out to avoid any risks to receptors as part of the construction and operation of the Proposed Development.</p>                                       |                           |
| Sailing Suitability                       | The site is currently used by Broadwater Sailing Club who report favourable sailing conditions. Races are hosted throughout the year.  | +1                        |
| Nature Conservation                       | The site is located in the Mid Colne Valley SSSI. Sections of the site are also covered by non-statutory local designations and supports priority habitat such as woodland. The habitats on-site also support nationally assemblages of breeding and overwintering birds, as well as other protected and non-protected faunal species. Ecology experts have advised the LB Hillingdon that there are no significant effects on any species, habitats and impact pathways assessed with all effects negligible or minor negative. | 0                         |
| Landscape, Built Heritage and Archaeology | <p>The site is set within the landscape context of the Colne Valley Regional Park. The area is characterised as a mosaic farmland, woodland and water within 200 kilometres of rivers, canals and over 60 lakes. The site is not located within or in the vicinity of any statutory designated or locally (non-designated) views.</p> <p>There are no locally or national listed buildings on or adjacent to the site. The Widewater Lock Cottage is located at the south-western corner of the site and is Grade II listed.</p> | 0                         |
| Total                                     |  | 3                         |

12.20 The advantages of the site include:

- **Lake Surface Area**– the site meets the area requirements for water based activities.
- **Land Surface Area** – the site meets the area requirements for land based activities.
- **Accessibility** - The site has good transport links. The access road is currently shared with the adjacent land occupiers GRS Bagging, Harleyford Aggregates and a small number of residential properties. A ProW (U74) runs outside of but adjacent to the eastern portion of the site, which also forms part of the Colne Valley Trail and London Loop.
- **Availability** – the majority of the site is owned by LB Hillingdon.

- **Sailing Suitability** - The site is currently used by Broadwater Sailing Club who report favourable sailing conditions. Races are hosted throughout the year.
- **Water Quality and Land Quality** – Both the water and land quality is suitable for the Proposed Development.
- **Landscape, Built Heritage and Archaeology** – there are no major sensitivities with respect to landscape/heritage associated with development at the site.

12.21 The disadvantages and the reasons for discounting the site for the Proposed Development is as follows:

- **Depth** - Some localised dredging would need to be undertaken to ensure the minimum depth is achieved throughout the Sailing Area.
- **Nature Conservation** - The location within the Mid Colne Valley SSSI is an ecological sensitivity. However significant effects can be avoided by focusing disturbance in the south-east corner of the site. Ecology experts have advised the LB Hillingdon that there are no significant effects on any species, habitats and impact pathways assessed with all effects negligible or minor negative.

12.22 Taking the above into account, the site would be an acceptable location for the Proposed Development. LB Hillingdon has costed the Proposed Development which can be delivered within the agreed £26.5 million budget.

## 13. Shortlist Assessment: Ruislip Lido

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### Site Location & Description

- 13.1 Ruislip Lido is located at Reservoir Road, Ruislip, HA4 7TY. The site is located within the administrative boundary of LB Hillingdon. The site is located to the east of Ruislip, between Ruislip Common and Ruislip Wood. It is approximately 3.6 kilometres from the former HOAC facility.
- 13.2 To the south of the site is an artificial beach with a children's play area and woodland centre / lakeside café. A narrow-gauge miniature railway (known as Ruislip Lido Railway) runs along the east, north and west of the lake.
- 13.3 An earth dam is located to the south-western part of the site.
- 13.4 The site is in multiple ownership. The site owners consist of; Affinity Water Limited; Gatehouse Bank PLC; MTD Housing Limited; The Guinness Partnership Limited; HS2 Ltd; and other freeholders. LB Hillingdon do not manage the entire lake perimeter. The Water's Edge pub controls a significant part of the waterfront and parking area.
- 13.5 Ruislip Lido measures at approximately 12 hectares and measures 300 metres at its widest point. The lake is a triangular shape and is retained by a dam at the southern end. An artificial beach is located in the south-east corner and a small area of building and hardstanding are present on the western part of the site. The lake is dominated by standing open water with a periphery of woodland, trees, beach and grassland.
- 13.6 The beach at the lido is open, but LB Hillingdon do not permit swimming due to; the shock of cold water make swimming and getting out of the water difficult; the depth of the water changes and is unpredictable; underwater hazards and objects may not be visible; and swimmer's itch can be caused by an allergic reaction to certain microscopic parasites living in the water<sup>24</sup>.
- 13.7 The site is located within the Metropolitan Green Belt.
- 13.8 The site is adjacent to land allocated as a Nature Conservation Sites of Borough Grade I and Grade II or Local Importance. The land adjacent is also designated as Ancient Woodland and an Archaeological Priority Area (as designated in the Hillingdon Local Plan (2020)). The woodland surrounding the lake is designated as a Priority Habitat of lowland dry acid grassland.
- 13.9 Ruislip Wood and Ruislip Common border the site to the north and south and are designated as Ancient Woodland. Both are also designated as National Nature Reserves and a SSSI. The site is not located within the Colne Valley Regional Park, but it is located in close proximity and in the wider landscape context.

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<sup>24</sup><https://www.hillingdon.gov.uk/ruisliplido#:~:text=The%20beach%20at%20Ruislip%20Lido,water%20changes%20and%20is%20unpredictable>

13.10 Mitigation could be explored to ensure that impacts on all species, habitats and impact pathways assessed are negligible or have a minor negative impact.

13.11 The site is surrounded by several PRoW. These comprise: R110; R109; R107; R38 and R59. These PRoWs are set back from the lake perimeter at c.100m, behind the existing tree line. On the east side of the lake, Park Wood Bridleway also follows the route of the existing PRoW. While these pathways are set back behind the treeline, directly surrounding the perimeter of the lake comprises the Ruislip Lido Millenium Trail and Ruislip Wood Walk, these pathways are classed as 'Other walks and trails'.

13.12 There is a high pressure water main, and a high pressure gas main located at the western part of the site, adjacent to the Ruislip Lido Railway line.

### Previous & Existing Use

13.13 The waterbody was originally built as a feeder reservoir for the Grand Junction Canal in 1811. The reservoir was opened in 1933 as a lido with facilities for swimming and boating. During the Second World War, the Lido was secretly used by the Royal Air Force (RAF) to train aircrew based at RAF Northholt and RAF Uxbridge in water survival methods.

13.14 The lake fell into disrepair during the 1970s and 1980s due to the closure of the main building, vandalism and arson. Since this, the lido has undergone renewal works and was the subject of the Hillingdon Improvement Programme (HIP) which was unveiled in 2010. The project enabled the area to be used for recreational purposes, which had previously been restricted due to pollution and an artificially low water level. The HIP resulted in the newly constructed Woodlands Centre and catering facility along with the refurbishment of the two stations at the Ruislip Lido Railway.

13.15 Ruislip Sailing Club were previously located at the site. The sailing club closed in the 1970s as the nature of the dam wall created water levels that were lowered to prevent flooding to nearby residential homes. The depth of the remaining water and available surface area for sailing was reduced to a level that prevented the sailing activities being undertaken.

### Short-List Assessment

13.16 A full RAG review is set out at **Table 10**.

**Table 10: Ruislip Lido RAG Rating**

| Requirement   | Detail  | Criteria Met (RAG Rating) |
|---------------|---|---------------------------|
| Site Security | The site is open to members of the public, so it cannot be completely secured for users of the Proposed Development. There are several PRoWs which are present within the site's proximity (ref. R107, R59, R109, R110). There is also a trail which runs around the perimeter of the lake, which is known as the Ruislip Lido Millenium Trail. | -1                        |
| Depth         | A bathymetric survey was undertaken in March 2023 and confirms that the average depth of water is 0.5 metres to 1 metres. There is  | -1                        |

| Requirement            | Detail   | Criteria Met (RAG Rating) |
|------------------------|--|---------------------------|
|                        | <p>also a significant height difference from the top of the dam to the bottom of the dam. Significant excavation and dredging works would be required to ensure that the proposed water-activities could take place. A copy of the bathymetric survey can be found at <b>Appendix 12</b>.</p> <p>The site is already susceptible to flooding given the majority of it is within Flood Zone 3. There is also historic flooding issues at Cannon Brook.</p>  |                           |
| Water and Land Quality | <p>There are microscopic parasites located within the lake which can cause an allergic reaction resulting in swimmer's itch<sup>25</sup>. There is also barbed wire from old fences, rubble which has been tipped into the lake, and historic structures such as a ski ramp within the lake itself. As such, swimming is not permitted on the lake. This suggests that the water quality is poor. Any water-based activities could have an impact on human health.</p> <p>A Preliminary Explosive Ordnance Risk Assessment (January 2025) has been undertaken which confirms that there is a potentially elevated likelihood of explosive ordnance during construction on site and a Stage 2 Detailed EO Risk Assessment is recommended prior to all groundwork commencing. A copy of the assessment can be found at <b>Appendix 13</b>.</p> <p>A Stage II Ground Investigation Survey was undertaken in March 2025. The Survey concluded that there is a risk to end users from elevated levels of polyaromatic hydrocarbons. Mitigation is therefore required. A copy of the Stage II Ground Investigation Survey is appended as <b>Appendix 14</b>.</p> <p>It is likely that the inclusion of standard contaminated land conditions that are to be progressed during the planning process could be agreed with the Council.</p> | +1                        |
| Sailing Suitability    | <p>The site used to be used for sailing activities in the 1970s, by the Ruislip Sailing Club. However, since the creation of the dam the depth of the remaining water and available surface area for sailing was reduced to a level that prevented the sailing activities to be undertaken.</p>  | -1                        |
| Nature Conservation    | <p>The site has no statutory designations for nature conservation, but is adjacent to two SSSI's, a National Nature Reserve, and a Nature</p>  | 0                         |

| Requirement   | Detail  | Criteria Met (RAG Rating) |
|---|---|---------------------------|
|   | Conservation Sites of Borough Grade I and Grade II or Local Importance. It is understood that the reservoir supports a wide range of wetland birds including teal, goldeneye, widegeon, shoveler, pintail, pochard, tufted duck, common tern, heron, kingfisher and great crested grebe. The presence of protected species such as great crested newt, slow worms and other reptiles are within the Ruislip Wood National Nature Reserve. Mitigation could be explored to ensure that impacts on all species, habitats and impact pathways assessed are negligible or have a minor negative impact.   |                           |
| Historic Environment & Landscape and Visual Impacts | <p>The site is located outside of but adjacent to the Colne Valley Regional Park. The area is characterised as a mosaic farmland, woodland and water within 200 kilometres of rivers, canals and over 60 lakes. The site is not located within or in the vicinity of any statutory designated or locally (non-designated) views.</p> <p>There are no heritage designations within the Site boundary, but there are several Listed Buildings (Grade II) within the Site's proximity. The closest comprises the Old Workhouse (Grade II) located approximately 200m west of the site. The Park Pale scheduled monument is located at the south-west of the site.</p> <p>The site is within the Metropolitan Green Belt.</p> | +1                        |
| Total   |   | -1                        |

13.17 In summary, the advantages of the site include:

- **Lake Surface Area**– the site meets the area requirements for water-based activities.
- **Site Availability** – parts of the site are owned and managed by LB Hillingdon.
- **Nature Conservation** – the site has little ecological value save for the site's location adjacent to SSSIs, a National Nature Reserve and a Nature Conservation Sites of Borough Grade I and Grade II or Local Importance.
- **Landscape, Built Heritage and Archaeology** – there are no major sensitivities with respect to landscape / heritage associated with the development of the site.
- **Water Quality and Land Quality** – Both the water and land quality is suitable for the Proposed Development.

13.18 The disadvantages and the reasons for discounting the site for the Proposed Development is as follows:

- **Land Surface Area** – although the site meets the area requirements for land-based activities, part of the site cannot be used as the perimeter of the lake is a PRoW (ref. ref. R107, R59, R109, R110). There is also a trail which runs around the perimeter of the



lake, which is known as the Ruislip Lido Millenium Trail. The south-western part of the site is a dam, so this can also not be redeveloped. There is a high pressure water main, and a high pressure gas main located at the western part of the site, adjacent to the Ruislip Lido Railway line which also cannot be redeveloped.

- **Depth** – the majority of the lake does not meet the minimum depth requirements of 1.5m. The lake is not an appropriate depth or surface area to support sailing facilities. Significant dredging and engineering works would be required to increase the depth of the lake, the risk of flooding would increase. The site is already susceptible to flooding given the majority of it is within Flood Zone 3. There are also historic flooding issues at Cannon Brook.
- **Site Security** – the lido is used by members of the public throughout the year. The site would not be exclusive to the users of the Proposed Development which could make safeguarding of future users such as children very challenging. There are a number of PRoWs surrounding the site (ref. R107, R59, R109, R110). There is also a trail which runs around the perimeter of the lake, which is known as the Ruislip Lido Millenium Trail.

13.19 Taking the above into account, the site has been discounted as a potential option for the Proposed Development.

## 14. Shortlist Assessment: Bury Lake

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### Site Location & Description

- 14.1 Bury Lake is located at the Rickmansworth Aquadrome, Frogmoor Lane, Rickmansworth, WD3 1NB. The site is located within the administrative boundary of Three Rivers District Council. The Site is located to the south of Rickmansworth and to the north east of Maple Cross. It is approximately 5.7 kilometres from the former HOAC facility.
- 14.2 To the west of the Site is Stockers Lake. To the east of the Site is Batchworth Lake. These lakes (along with Bury Lake) form the Rickmansworth Aquadrome. Rickmansworth Aquadrome is a nature reserve with woodland, accessible paths, a café, play areas and access to the Grand Union Canal.
- 14.3 The Site is owned and managed by Three Rivers District Council.
- 14.4 The Site is located within the Metropolitan Green Belt. It also forms part of the wider Rickmansworth Aquadrome which is a designated Local Nature Reserve. The Site is also designated as a Local Wildlife Site. The Springwell Lock Conservation Area and Stockers Lock and Farm Conservation Area are also located adjacent to the Site, at the southern boundary.
- 14.5 A PRoW (ref. 065) runs along the western boundary of the Site.
- 14.6 Bury Lake measures at approximately 8.5 hectares. The land surrounding Bury Lake measures at approximately six hectares. The surrounding land is heavily vegetated.
- 14.7 A series of ecological surveys were undertaken at the Site throughout 2024, examining multiple species of vertebrate and invertebrate, including bats, mammals, bugs, reptiles, amphibians. *Teredus cylindricus* was found at the Site. This beetle is one of the 13 nationally recognised endangered species of invertebrates that live at the site<sup>26</sup>.
- 14.8 A Natural Heritage Networks Evaluation Report (2024) has been prepared by the Countryside Management Service, Three Rivers District Council and the Natural Lottery Heritage Fund. The report confirms that Rickmansworth Aquadrome is an important site for waterfowl and has records for national notable beetles. The report states that although the Aquadrome is a popular nature reserve and appreciated green space, but important biodiversity features are at risk of being lost and are in a poor condition.

### Previous & Existing Use

- 14.9 Bury Lake forms part of the Rickmansworth Aquadrome which is a public park and Local Nature Reserve with history rooted in the gravel extraction and boat building activities of Harry Walker. The two lakes – Bury Lake and Batchworth Lake – were created by the extraction of gravel for the original Wembley Stadium.

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<sup>26</sup> <https://www.threerivers.gov.uk/news/aquadrome-mosaic-unique-wildlife-habitats>

14.10 Bury Lake is now used by several organisations including:

- Bury Lake Young Marines – The Club promotes the development of life skills in young people through sailing and related activities. It is an award-winning local youth charity, run entirely by volunteers.
- The Three Rivers Radio Yachting Club – The Club encourages members to build and race radio-controlled model yachts.
- Nomad Kayak Club – The Club offers its members a wide range of kayaking and canoeing opportunities, ranging from complete beginners to elite sport paddlers.
- Colne Valley Special Sailors – A charity providing sailing for people of all ages with various disabilities.
- Uxbridge Rovers Angling and Conservation Society – An established angling society who hold the fishing rights at Bury Lake.

14.11 As set out in the accompanying report prepared by Peter Bentley Limited, Rickmansworth Aquadrome manages the competing demands for space, both ashore and afloat but acknowledges that the area of the lake is insufficient to concurrently accommodate all the users safely and efficiently. Nomad Canoe Club are constrained by their operations by the area of the lake allocated to them and the Colne Valley Special Sailors are compromised in their ability to satisfy demand for disabled sailing by the lack of space both ashore and afloat.

14.12 It has been widely reported<sup>27</sup> that there is Asbestos Containing Material (ACM) at the site, which was deposited following the completion of gravel extraction in the 1920s and 1930s, when the risks posed by asbestos fibres were unknown and the rules around disposal were unregulated. ACMs in an untouched state are generally safe in general day-to-day use, however any disturbance from construction works could release asbestos fibres into the atmosphere.

## Short-List Assessment

14.13 A full RAG review is set out at **Table 11**.

**Table 11: Bury Lake RAG Rating**

| Requirement            | Detail  | Criteria Met (RAG Rating) |
|------------------------|---|---------------------------|
| Site Security          | The site is open to members of the public, so it cannot be completely secured for users of the Proposed Development. There is a PRoW located at the western boundary of the Site (ref. 065).  | -1                        |
| Depth                  | The accompanying report prepared by Peter Bentley concludes that the depth of Bury Lake is 'adequate' for sailing activities.   | +1                        |
| Water and Land Quality | It has been widely reported <sup>28</sup> that there is Asbestos Containing Material (ACM) at the site, which was deposited following the completion of gravel extraction in the 1920s and 1930s, when the risks posed by asbestos fibres were unknown and the rules around | -1                        |

<sup>27</sup> <https://www.bbc.co.uk/news/uk-england-beds-bucks-herts-67919314>

<sup>28</sup> Ibid

| Requirement   | Detail   | Criteria Met (RAG Rating) |
|---|--|---------------------------|
|   | <p>disposal were unregulated. ACMs in an untouched state are generally safe in general day-to-day use, however any disturbance from construction works could release asbestos fibres into the atmosphere.</p> <p>The hazardous material was discovered in five locations around Bury Lake and Batchworth Lake in a survey that emerged after Rickmansworth Canal Festival was cancelled amid new plans to manage the waste. Three Rivers District Council believe that “significant quantities” of asbestos cement, textile, insulating board and other materials were buried after gravel was extracted in the 1920s and 1930s<sup>29</sup>. Although the five locations are only ones confirmed, officials believe that asbestos is underground throughout the Site. The Rickmansworth Waterways Trust cancelled the festival indefinitely after it learned that any activity that would potentially disturb the material was prohibited<sup>30</sup>.</p> <p>Three Rivers District have advised that water based activities such as sailing, water-skiing and angling are believed to be safe as the asbestos fibres in the air are “encapsulated” by the water. Land based activities and accompanying groundworks pose a significant risk given the asbestos located underground.</p> |                           |
| Sailing Suitability                                 | The site is already used for sailing and is therefore suitable for this activity.  | +1                        |
| Nature Conservation                                 | The site has no statutory designations for nature conservation but is designated as a Local Nature Reserve and Local Wildlife Site. A series of ecological surveys were undertaken at the Site throughout 2024, examining multiple species of vertebrate and invertebrate, including bats, mammals, bugs, reptiles, amphibians. Teredus cylindricus was found at the Site. This beetle is one of the 13 nationally recognised endangered species of invertebrates that live at the site <sup>31</sup> . Mitigation could be explored to ensure that impacts on all species, habitats and impact pathways assessed are negligible or have a minor negative impact.  | 0                         |
| Historic Environment & Landscape and Visual Impacts | The site is set within the landscape context of the Colne Valley Regional Park. The area is characterised as a mosaic farmland, woodland and water within 200 kilometres of rivers, canals and over  | 0                         |

<sup>29</sup> <https://www.watfordobserver.co.uk/leisure/24051125.map-shows-asbestos-sites-rickmansworth-aquadrome/>

<sup>30</sup> Ibid

<sup>31</sup> <https://www.threerivers.gov.uk/news/aquadrome-mosaic-unique-wildlife-habitats>

| Requirement | Detail   | Criteria Met (RAG Rating) |
|-------------|--|---------------------------|
|             | <p>60 lakes. The site is not located within or in the vicinity of any statutory designated or locally (non-designated) views.</p> <p>The Site is located outside of but adjacent to the Springwell Lock Conservation Area and Stockers Lock and Farm Conservation Area which are both located at the southern boundary of the Site. There are also a series of listed buildings located at the southern boundary of the Site, including Stockers Lock House (Grade II Listed) and Stockers House (Grade II Listed).</p> <p>The site is within the Metropolitan Green Belt.</p> |                           |
| Total       |  | 0                         |

14.14 In summary, the advantages of the site include:

- **Nature Conservation** – the site has little ecological value save for the site’s location as a Local Nature Reserve and Local Wildlife Site.
- **Lake Surface Area** – the site does meet the requirements of the lake surface area, but there is already competing demand for lake space by the existing users.
- **Land Surface Area** – the site meets the requirements for land surface area, however significant vegetation removal would be required.
- **Landscape, Built Heritage and Archaeology** – there are no major sensitivities with respect to landscape / heritage associated with the development of the site.
- **Depth** – the depth of the lake is suitable for sailing.

14.15 In summary, the disadvantages and the reasons for discounting the site for the Proposed Development are as follows:

- **Site Availability** – the site is owned and managed by Three Rivers District Council
- **Water and Land Quality** – although the water quality is suitable for the Proposed Development, there is asbestos located on the surrounding land. This poses a significant risk to land based activities and future groundworks.
- **Site Security** – the site is publicly accessible. There is also a PRow (ref. 065) located at the western boundary of the site.

14.16 Taking the above into account, the site has been discounted as a potential option for the Proposed Development.

# 15. Shortlist Assessment: Aldenham Reservoir

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## Site Location & Description

- 15.1 Aldenham Reservoir is located within Aldenham Country Park, Aldenham Road, Radlett, Borehamwood, WD6 3BA. The site is located within the administrative boundary of Hertsmere Borough Council. It is approximately 13.31 kilometres from the former HOAC facility.
- 15.2 To the west of the Site is an industrial estate and further beyond is Hillfield Park Reservoir. To the north and east of the site is a mix of greenfield and agricultural land. To the south of the Site are two industrial estates and further beyond that is the A41 and M1.
- 15.3 The Site is owned by Jewel of Hertsmere Limited. The Site is managed by Aldenham Renaissance Ltd.
- 15.4 The Site is located within the Metropolitan Green Belt. It also forms part of the Watling Chase Community Forest Area which is a designed Community Open Space. The Site also forms part of the wider Hertsmere Local Wildlife Site. Aldenham House (Grade II Park and Garden) is located approximately 200 metres from the northern boundary of the Site.
- 15.5 A series of PRow's are located around the site boundary (ref. 001#2, 005, 021, 052, 064, 065 and 095). These PRow's form a circular trail around the reservoir. The Aldenham Country Park website states that the reservoir is in private ownership but there is an agreement for the circular reservoir trail to remain open at all times for the enjoyment of the general public.
- 15.6 Aldenham Reservoir measures at approximately 18 hectares. The land surface area measures at approximately 15 hectares. It is formed in a shallow valley with an earthen dam at the northern end. The surrounding area is low-lying.
- 15.7 Aldenham Reservoir is home to a variety of wildfowl, including Mandarin Ducks, Ring-necked Parakeets and Peregrines, as well as other species like Swallows, House Martins and Swifts.

## Previous & Existing Use

- 15.8 Aldenham Reservoir forms part of Aldenham Country Park which is a public park and Local Wildlife Site. In the 1930's. the Grand Union Canal Company made the reservoir available for boating, bathing and fishing, with car parking and informal refreshment facilities. In 1973, the reservoir was no longer required for drinking water.
- 15.9 Between 1938 and 1972, the Country Park and Reservoir had various uses until the site was made open to the public. The Planning and Estates Department took over the running of the park in 1972 and continued working to maintain and enhance the park for the Public. In 2012, Aldenham Renaissance Ltd took over the management of the Park.

15.10 Aldenham Sailing Club previously operated from the reservoir for a period of 83 years but suspended all sailing activities in 2020 as the water level in the reservoir is too low<sup>32</sup>. This is due to issues with the stability of its dam and subsequent low water levels. It is not clear if or when the dam will be repaired and water levels restored.

### Short-List Assessment

15.11 A full RAG review is set out at **Table 12**.

**Table 12: Aldenham Reservoir RAG Rating**

| Requirement   | Detail  | Criteria Met (RAG Rating) |
|---|---|---------------------------|
| Site Security                                       | The public footpaths which surround the Site are open to members of the public, so it cannot be completely secured for users of the Proposed Development. A series of PRow's are located around the site boundary (ref. 001#2, 005, 021, 052, 064, 065 and 095).  | -1                        |
| Depth   | The depth of the water level is too low for sailing activities. Sailing activities have not taken place at the site since 2020.   | -1                        |
| Water and Land Quality                              | There is no evidence to suggest that the water and land quality is not sufficient for the Proposed Development.   | 0                         |
| Sailing Suitability                                 | The depth of the water level is too low for sailing activities. Sailing activities have not taken place at the site since 2020.   | -1                        |
| Nature Conservation                                 | The site has no statutory designations for nature conservation but is designated as Local Wildlife Site. Aldenham Reservoir is home to a variety of wildfowl, including Mandarin Ducks, Ring-necked Parakeets and Peregrines, as well as other species like Swallows, House Martins and Swifts. Mitigation could be explored to ensure that impacts on all species, habitats and impact pathways assessed are negligible or have a minor negative impact. | 0                         |
| Historic Environment & Landscape and Visual Impacts | Aldenham House (Grade II Park and Garden) is located approximately 200 metres from the northern boundary of the Site.   | 0                         |
| Total   |   | -3                        |

15.12 In summary, the advantages of the site include:

- **Nature Conservation** – the site has little ecological value save for the site's location as a Local Wildlife Site.
- **Lake Surface Area** – the site meets the requirements for lake surface area.

<sup>32</sup> <https://aldenhamsc.co.uk/j3/>

- **Land Surface Area** – the site meets the requirements for land surface area, however significant vegetation removal would be required.
- **Landscape, Built Heritage and Archaeology** – there are no major sensitivities with respect to landscape / heritage associated with the development of the site.
- **Water and Land Quality** – There is no evidence to suggest that the water and land quality is not sufficient for the Proposed Development.

15.13 In summary, the disadvantages and the reasons for discounting the site for the Proposed Development are as follows:

- **Depth** – The depth of the water level is too low for sailing activities. Sailing activities have not taken place at the site since 2020.
- **Site Availability** – The Site is owned by Jewel of Hertsmere Limited. The Site is managed by Aldenham Renaissance Ltd.
- **Sailing Suitability** - The depth of the water level is too low for sailing activities. Sailing activities have not taken place at the site since 2020.
- **Site Security** – the site is publicly accessible. A series of PRow's are located around the site boundary (ref. 001#2, 005, 021, 052, 064, 065 and 095).

15.14 Taking the above into account, the site has been discounted as a potential option for the Proposed Development.



## 16. Shortlist Assessment: Denham Quarry (Summerleaze Lake / New Denham Quarry)

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### Site Location & Description

- 16.1 Summerleaze Lake is located at New Denham Quarry, Denham Road, Buckinghamshire, UB9 4EH. The site is located within the administrative boundary of Buckinghamshire Council (South Buckinghamshire).
- 16.2 The Site is approximately 800m west of Uxbridge Town Centre. New Denham village lies to the north-east of the site, immediately beyond the A402. The site extends approximately 68.4 hectares.
- 16.3 The Site is located within Metropolitan Green Belt and a Biodiversity Opportunity Area, as designated by the South Bucks Local Plan (2011). It is also allocated as a Preferred Area for Sand and Gravel Extraction within the Bucks Minerals and Waste Local Plan (2019). The Site is not subject to any other designations.
- 16.4 The Site comprises the lakes at New Denham Quarry (approximately three lakes totalling 16 hectares). These three lakes are situated within several irregular enclosed fields, used for grazing and grass crops. The field boundaries are marked by sparse hedgerows, interspersed with trees; post and wire fences; and ditches. Several small woodlands are located along a hedge line running northwest to southwest through the centre of the Site and the Rusholt Brook transects the Site from east to west.
- 16.5 The Site lies approximately 35 metres AOD with a slight rise to the northwest towards Willets Lane. The topography of the surrounding land is generally flat, with an area of higher land approximately 600 metres to the southwest, associated with Long Coppice and land surrounding Round Coppice Farm, at a level of approximately 52 metres AOD.

### Previous & Existing Use

- 16.6 The New Denham Quarry is currently an operational quarry for the extraction of sand and gravel, it is managed and operated by Summerleaze Ltd under a lease from Buckinghamshire County Council (BCC). Summerleaze are a local privately-owned company, specialising in mineral extraction, site restoration, waste management and renewable energy.
- 16.7 The Site has operated as a quarry since 2007 and is coming to the end of its permitted reserves. An EIA scoping opinion request (SCOP/11/24) has been submitted to BCC for the extension of the site to enable the continuation of supply of sand and gravel to the local market.
- 16.8 The Site's recent planning history is set out at **Table 13**.

**Table 13: Summerleaze Lakes Planning History (Buckinghamshire Minerals and Waste Planning)**

| Reference    | Description  | Status   |
|--------------|--|--|
| CM/22/16     | Extension of existing sand gravel extraction and restoration for relocation of Hillingdon Outdoor Activities Centre (HOAC)   | Application approved on 14 March 2017<br><br>Permission has now expired.     |
| CM/23/16     | Northern Extension to existing sand and gravel extraction  | Application approved on 31 March 2017  |
| SCREEN/83/18 | Request for a screening opinion under the Environmental Impact Assessment Regulations 2011 (as amended) in connection with a proposed temporary use of land and water bodies to accommodate an outdoor activity centre at New Denham Quarry, Oxford Road, Hillingdon, UB9 4HE.   | EIA not confirmed as not required on 9 November 2018<br><br>EIA not required |
| CM/0087/18   | Two year temporary use of land and water bodies (including the construction of a new temporary vehicular access onto the A4020, the temporary placement of single storey modular buildings and shipping containers, the erection of a temporary highropes course and zipwire, the temporary use of a dwellinghouse for seasonal staff accommodation and the temporary use of existing outbuildings as workshops and storage) to accommodate an Outdoor Activity Centre | Application withdrawn on 19 September 2019                                   |
| CM/0003/23   | Mineral extraction with low level restoration to lakes, woodland and grassland, as an eastern extension to New Denham Quarry.  | Application approved on 6 January 2025                                       |
| SCOP/11/24   | Scoping Opinion for mineral extraction from the extension site, with restoration to agriculture and biodiversity enhancement, using site derived and imported inert restoration materials and retention of the existing processing plant, stockpiling area, site offices, weighbridge, staff facilities and concrete batching plant to serve the new extension area.   | Application pending determination.   |

16.9 HS2 Ltd and the Association previously undertook an exercise to identify suitable sites for the relocation of the former HOAC facility. Summerleaze Lake was selected in agreement with the Association after a study of feasibility options, as set out in Volume 3: Main Environmental Statement (ES). The site was considered suitable due to its location close to the south of the A40/M40, approximately 3.5 kilometres south of the former HOAC facility and is therefore in a reasonable catchment of its current users.

16.10 As set out in Section 3 of this ASA, an application (planning permission ref. CM/22/16) was approved for the restoration of the Summerleaze Lake for the Proposed Development in March 2017. The planning permission has since expired as it was never implemented.

16.11 The planning permission was never implemented due to the viability of relocating the former HOAC facility to Summerleaze. The programme of works was concluded to be unviable, as set

out by the Secretary of State in their letter to the Association dated 18<sup>th</sup> October 2016. A copy of the letter can be found at **Appendix 15**.

16.12 The Secretary of State set out the following in their letter:

*I am writing to inform you that despite our best efforts, as negotiations have progressed it has become clear this relocation arrangement is at great risk of not being financially sustainable. The anticipated costs have more than doubled and the deal presents a clear risk that HOAC will face severe operating difficulties down the line.*

*The lease conditions required by Buckinghamshire County Council for the Denham Quarry Site are more commercial than you currently have. This means that, assuming the same turnover, your lease costs will be £20,000 higher. In addition, Hillingdon Council has been clear that the £54,600 per annum grant, which represents 8% of HOAC's current income, will cease if HOAC move out of their administrative boundary. Buckinghamshire County Council and South Buckinghamshire District Council have been clear that they will not replace this funding. In addition, it is not clear whether South Buckinghamshire will require HOAC to pay business rates at Denham Quarry unlike Hillingdon. This represents a clear threat to the on-going viability of HOAC at the Denham Quarry Site. Furthermore, the expected cost of the Denham Quarry site, including optimism bias, is now £55.1m. This means there is a very real prospect of a significant expenditure of public money on relocation that will result in HOAC facing severe operating difficulties or failing to operate.” (our emphasis).*

16.13 An application for extension and restoration to the northern part of the Site was permitted in 2017 (CM/23/16), this permitted reserve is now coming to the end of its life. A subsequent application for a small extension to the east of the Site was permitted in January 2025 (CM/0003/23) and it expected to have begun construction in Summer 2025. A further application is due to be submitted following the Scoping Opinion submitted in May 2024 (SCOP/11/24). This application also seeks to extend the Site to the northwest because additional reserves will be needed to enable the continuation of supply minerals from Denham Quarry. These proposals will provide an additional lake on-site.

16.14 Following the quarrying works, the site will be restored to a lake with surrounding trees, hedgerows, shrub and grassland. This restoration scheme will create an improvement to the local landscape character, to local amenity and to biodiversity enhancement. This new green space will provide green infrastructure connections and promote health and social well-being through the opportunity for additional public access and public amenity value, by connecting to approved new PROWs to be created within the main quarry.

16.15 The proposed restoration plans for the Site are presented in **Appendix 16**. The site is expected to be available by 2028.

### **Short-list Assessment**

16.16 A full RAG Review is set out at **Table 14**.

**Table 14: RAG Review of Summerlease Lake**

| Requirement   | Detail  | Criteria Met (RAG Rating) |
|---|---|---------------------------|
| Site Security                                       | The approved restoration plans (CM/0003/23) includes additional public access and public amenity value, by connecting to approved new PRoWs to be created within the main quarry. An access road for the new substation to the south of the site (PL/24/0449/FA) will run through the middle of the site. The southern boundary of the site   | -1                        |
| Depth   | The lake on the east side of the site a max. of 5m depth. In the middle of the Site is a larger lake is a max. of 5m depth.   | +1                        |
| Water and Land Quality                              | Water quality sampling shows that results are found to meet the European Commission Bathing Water Directive. The water quality standards were found to have been met in a compliance assessment for the WFD contained within the previous applications ES (CM/22/16).<br>The ES also concluded that remediation works as part of the restoration scheme would ensure that the land quality is suitable for the proposed uses.   | +1                        |
| Sailing Suitability                                 | The Site was previously considered suitable for the relocation of sailing activities from Dews Lane. However, this application proposed an extension to the existing lake to the north-east in order to ensure the main lake was the right shape and large enough for HOAC's sailing use. Regarding wind conditions, these were deemed suitable for the previous application. In the configuration of the proposed design, the prevailing wind direction informed building orientation. | 0                         |
| Nature Conservation                                 | The Site is not located within an area of ecological sensitivity, including SSSI or NNR. The closest ecological designation is located 200m west comprising Kingcup Meadows and Oldhouse Wood SSSI.   | +1                        |
| Historic Environment & Landscape and Visual Impacts | The site is set within the landscape context of the Colne Valley Regional Park. The Site is within Metropolitan Green Belt.<br><br>Archaeological assessment undertaken as part of a previous quarrying application in 2014 (CM/32/14) has established that there are areas of archaeological interest within the site. The interest is defined as the presence of buried archaeological remains within the Site relating to Late Glacial period activity.                              | +1                        |

| Requirement | Detail  | Criteria Met (RAG Rating) |
|-------------|---|---------------------------|
|             | <p>There are no heritage designations within the Site boundary, but there are several Listed Buildings within the Site's proximity.</p> <p>There are four PRoWs which are present within or in close proximity to the proposed development.</p> |                           |
| Total       |   | +4                        |

16.17 In summary, the advantages of the Site include:

- **Accessibility** – the Site has good transport links. The access road is currently used in association with the works carried out at an existing quarry.
- **Location** – the lake is close to the previous HOAC location, which would re-provide the displaced community facilities in a close proximity to the previous users of the site.
- **Historic Environment & Landscape and Visual Impacts** – there are no major sensitivities with respect to landscape/heritage associated with the development of the Site.
- **Depth** – two of the lakes are an appropriate depth.
- **Ecological considerations** – there are no major sensitivities with respect to ecology associated with the development of the Site.

16.18 The disadvantages of the Site include:

- **Existing Uses** – the Site is currently in use as a working quarry, these activities would need to cease operation on the lakes for it to be used in association with water sports.
- **Sailing Suitability** – significant excavation works are required to ensure the lakes are suitable for sailing.

16.19 Although the site could be a potential location for the Proposed Development, it has already been demonstrated that the proposed development in this location is not viable and would cost more than the £26.5 million which has been agreed between HS2 Ltd, The Secretary of State for Transport and LB Hillingdon in their legal agreement dated August 2017. This cost was primarily due to the Stage and 1 and 2 excavation works required to join the two lakes, which would still be required with the currently proposed (reduced) scheme. There are no other sources of funding likely to be available from LB Hillingdon or HS2 Ltd for the proposed scheme which would cost over double the amount of the agreed £26.5 million.

## 17. Summary and Conclusions

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- 17.1 LB Hillingdon has undertaken an appraisal of potential sites to accommodate the relocation of the former HOAC facility. This ASA assesses the alternative sites that have been considered in selecting the proposed site for the Proposed Development. The purpose of this document is to ascertain which site is the most suitable for the proposed development and to demonstrate that all reasonably available and suitable alternatives have been properly considered.
- 17.2 In August 2017, a legal agreement between HS2 Ltd, The Secretary of State for Transport and LB Hillingdon was agreed. The Agreement states that LB Hillingdon will use reasonable endeavour, working together with HS2 Ltd to within three years from the date of the agreement, design and implement a scheme for the relocation of the former HOAC facility to Denham Quarry or such other suitable site or sites to be agreed with HS2 Ltd, the Association and the relevant local authorities. The agreement states that the cost should be no greater than £26.5 million.
- 17.3 Planning permission (ref. CM/22/16) was granted in March 2017 at Summerleaze Lakes (also known as New Denham Quarry) for the relocation of the former HAOC facility. The development was not taken forward due to the viability concerns which were raised by the Secretary of State. The former HOAC facility has therefore remained closed since October 2020.
- 17.4 A total of 71 sites within a 20-kilometre radius of the former HOAC facility have been assessed as part of this ASA. All 71 sites were assessed against five Stage 1 Assessment Criteria. The criteria are lake surface area, land surface area, accessibility, designated sites (International or European) and intersected by HS2, or in close proximity to noisy infrastructure and activities.
- 17.5 A total of three sites met all five Stage 1 Assessment Criteria and were therefore moved to the short-list assessment and assessed against the Stage 2 Assessment Criteria. A further two sites were close to meeting all five criteria and have therefore been assessed. The criteria are site security, depth, water and land quality, sailing suitability, nature conservation, historic environment and landscape and visual impacts.
- 17.6 The five sites which were assessed against the Stage 2 Assessment Criteria were Ruislip Lido, Broadwater Lake, Summerleaze Lake (New Denham Quarry), Bury Lake and Aldenham Reservoir.
- 17.7 Ruislip Lido is not suitable for the Proposed Development. The lido is used by members of the public throughout the year and would not be exclusive to the users of the Proposed Development which could make safeguarding for future users such as children and students very challenging. There are also a number of PRoWs surrounding the site (ref. R107, R59, R109, R110). There is also a trail which runs around the perimeter of the lake, which is known as the Ruislip Lido Millenium Trail.
- 17.8 The lake also contains microscopic parasites which makes swimming not viable within the lake. There is also a potentially elevated likelihood of explosive ordnance on the land surrounding the site. This could pose a risk to human health.
- 17.9 Although the site meets the land surface area requirements, large parts of the land cannot be used. The south-western part of the site is a dam, so this can also not be redeveloped. There is a

high pressure water main, and a high pressure gas main located at the western part of the site, adjacent to the Ruislip Lido Railway line which also cannot be redeveloped. The majority of the

lake also does not meet the minimum depth requirements for sailing, which is one of the key provisions of the Proposed Development.

- 17.10 Broadwater Lake is suitable for the Proposed Development, however minor dredging works in localised areas in required areas which have been identified as shallower in the appended bathymetric survey.
- 17.11 Summerleaze Lake (New Denham Quarry) is also physically suitable for the Proposed Development however it has already been demonstrated that the proposed development in this location is not viable and would cost significantly more than the £26.5 million which has been agreed between HS2 Ltd, The Secretary of State for Transport and LB Hillingdon in their legal agreement dated August 2017. This cost was primarily due to the Stage and 1 and 2 excavation works required to join the two lakes, which would still be required with the currently proposed (reduced) scheme. There are no other sources of funding likely to be available from LB Hillingdon or HS2 Ltd for the proposed scheme which would cost over double the amount of the agreed £26.5 million.
- 17.12 Bury Lake is not suitable for the Proposed Development. The site does not meet the requirements of the lake surface area and there is already competing demand for lake space by the existing users. Although the water quality is suitable for the Proposed Development, there is asbestos located on the surrounding land. This poses a significant risk to land based activities and future groundworks.
- 17.13 Aldenham Reservoir is not suitable for the Proposed Development. The depth of the water level is too low for sailing activities. Sailing activities have not taken place at the site since 2020. The Site is also bound by several PRoW which would make it challenging to secure for private use.
- 17.14 To conclude, LB Hillingdon have thoroughly considered all alternative sites for the Proposed Development.

## Appendix 1 – SCC Alternative Site Assessment Guidance (May 2021)



# Alternative Site Assessment Guidance

This guidance seeks to assist applicants and planning officers in understanding the purpose of and process for undertaking an Alternative Site Assessment (ASA) to support a planning application in the context of inappropriate waste management development in the Green Belt.

## What is an Alternative Site Assessment?

The purpose of an ASA is to support a planning application for inappropriate waste management development in the Green Belt by identifying the most appropriate site for the development, and demonstrating that all other suitable and available land outside of the Green Belt has been properly considered and discounted in selecting the application site.

Essentially an ASA should: (1) establish and justify the area in which it is appropriate to search for an alternative site; (2) set out the search criteria to assess potential sites against; and (3) evaluate the suitability of alternative sites using objective weighting criteria. The ASA should be sequential in nature and focus on non-Green Belt land before considering other alternative sites within the Green Belt. It should also be proportionate to the nature and scale of the development proposed.

A robust ASA should consider whether there are alternative sites for both the proposed waste management development in its entirety and for the proposed development in a 'disaggregated form'. Although there may be benefits to the co-location of waste operations, a range of suitable alternative non-Green Belt sites could exist for individual waste management elements proposed.

## When is an Alternative Site Assessment required?

The National Planning Policy Framework 2019 (NPPF) explains that the Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (paragraph 133). Paragraph 143 of the NPPF establishes a presumption against inappropriate waste management development in the Green Belt<sup>1</sup> because it is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'.

Policy 9 of the Surrey Waste Local Plan 2020 (SWLP) states that planning permission will not be granted for inappropriate waste development in the Green Belt, unless it is shown that very special circumstances exist. It states that 'very special circumstances' will not exist unless the potential harm caused to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations associated with the proposal, either on their own or in combination. This policy approach is consistent with paragraph 144 of the NPPF.

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<sup>1</sup> Subject to the exemptions listed in paragraphs 145 and 146 of the NPPF

The preamble to Policy 9 explains that the following considerations may contribute to very special circumstances:

1. The lack of suitable non-Green Belt sites;
2. The need to find locations well related to the source of waste arisings;
3. The characteristics of the waste development including the scale and type of facility;
4. The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites;
5. The site is identified as suitable for waste development under Policy 10 or Policy 11 of the SWLP;
6. The wider environmental benefits associated with increased production of energy from renewable sources.

Consequently, where inappropriate waste management development is proposed in the Green Belt an important and fundamental question is whether suitable land beyond the Green Belt exists which can be developed as an alternative to meet the same need.

To demonstrate compliance with Policy 9 an ASA will be required in most circumstances for waste management development in the Green Belt. However, an ASA may not be relevant to site specific proposals in some instances, including engineering operations such as landraising; composting on agricultural land for use on that same land; restoration of a mineral working by landfilling; and development of or at an existing waste management site.

Applicants are encouraged to consult with the County Planning Authority (CPA) using the CPA's [pre-application advice service](#) if they are unsure as to whether an ASA is required to support a planning application. Where an ASA is not considered relevant the applicant should justify this in the respective Planning Statement and/or Green Belt statement submitted in support of the planning application.

## **How to prepare an Alternative Site Assessment**

For the CPA to judge that an ASA contributes to the demonstration of 'very special circumstances' in compliance with Policy 9 of the SWLP, it should provide clear evidence that the availability of suitable non-Green Belt sites has been rigorously assessed. There is no standard or adopted procedure for undertaking ASA's however the following stages are recommended and can be used as a guide to ensure a structured, logical and objective planning-based approach has been undertaken.

## **Recommended Stages of an Alternative Site Assessment**

### **1) Identification of Search Area**

The first stage of the assessment should be to identify a catchment area the proposed waste management development will serve, based on the need for the development in the context of relevant waste arisings, waste management capacity, transport links including the strategic road network, and any specific markets. The identification of a catchment area will need to be clearly justified within the ASA as it will provide a specific search area for the identification of suitable alternative non-Green Belt sites. Depending on the type of facility proposed and the location of the

catchment area it may also be relevant to consider sites in neighbouring counties, which will also need to form part of the identification and assessment of sites and will contribute to the development of a robust ASA.

## 2) Initial Site Identification

This stage of investigation should commence with an identification of a 'long list' of available sites within the identified catchment area, which have potential to accommodate the proposed development. This list is likely to comprise a combination of existing development sites, allocated development sites, active waste/mineral sites and previously developed land. The table below provides various sources of information which can be drawn on for this stage of investigation and the detail of any evidence gathered should be incorporated into the ASA to demonstrate a robust identification of sites process has been undertaken.

### Potential sources of information

1. SWLP (2020), site allocations and site assessment reports: [SWLP Part 2 – Sites and Areas of Search](#); and Site Identification and Evaluation Report (available on request – contact [mdf@surreycc.gov.uk](mailto:mdf@surreycc.gov.uk))
2. Industrial Land Areas of Search (ILAS) as identified under Policy 10 of the SWLP (2020): [SWLP Part 2 – Sites and Areas of Search](#); and Industrial Land Areas of Search Identification Report (available on request – contact [mdf@surreycc.gov.uk](mailto:mdf@surreycc.gov.uk))
3. Surrey District/Borough adopted and emerging Local Development Plan Documents, proposal maps and existing and proposed employment land allocations/reviews: [Local Planning Applications](#)
4. Existing Business and Industrial Sites/Parks: [Estates Gazette](#)
5. Brownfield Register (held at District/Borough Council): [Local Planning Applications](#)
6. Satellite aerial photography/maps and Ordnance Survey (OS) Maps: [Surrey Interactive Map](#) and [Magic Maps](#).
7. Estate/Land agents: [Estates Gazette](#)
8. Critical review of existing ASAs that have been prepared in support of recent planning application for waste development in Surrey: [Online register of planning applications for Minerals, Waste and County Council Development](#).

## 3) Site Appraisal and Evaluation

The third stage of the ASA should comprise an assessment of the site-specific requirements for the proposed development against the 'long list' of available sites. There are various ways in which this can be achieved but the chosen approach should be clearly explained within the methodology section of the ASA; it should be sequential in nature (considering non-Green Belt sites before Green Belt sites) and it should include an explanation as to why rejected sites were not considered suitable for the proposed development in the context of the site-specific criteria identified. Below is a suggested list of key site-specific characteristics that may be applicable to the proposed development:

- Practical and Operational Matters – size of site, building requirements, open space requirements.

- Access – suitable vehicular access, proximity to strategic road network.
- Location - proximity to sensitive receptors (>250m), existing and future area of operations.
- Relationship to Market – proximity to any existing/remaining premises, suppliers, and markets.
- Designations – Area of Outstanding Natural Beauty (AONB), Conservation Area.

In addition, Appendix B (Locational Criteria) of the [National Planning Policy for Waste \(NPPW\) 2014](#) sets out a number of factors to consider in testing the suitability of sites and areas for waste development, which are set out in the table below.

| <b>Criteria</b>  | <b>Considerations</b> (See Appendix B of NPPW for further information)  |
|--|---|
| <b>Protection of water quality and resources and flood risk management</b> | Proximity of vulnerable surface and groundwater or aquifers, management of potential flood risk and risk posed to water quality.  |
| <b>Land Stability</b>  | Locations that are liable to be affected by land instability, will not normally be suitable for waste management facilities   |
| <b>Landscape and visual impacts</b>  | The potential for design-led solutions to produce acceptable development which respects landscape character; the need to protect landscapes or designated areas of national importance and localised height restrictions.                                 |
| <b>Natural conservation</b>  | Any adverse effect on a site of international importance for nature conservation (SPA, SAC's and RAMSAR sites), nationally recognised designations (SSSI's and NNR's) and natural improvement areas and protected species.                                |
| <b>Conserving the historic environment</b>                                 | Potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.  |
| <b>Traffic and access</b>  | Suitability of the road network and to the extent to which access would require reliance on local roads, the rail network and transport links.  |
| <b>Air emissions (including dust and odour)</b>                            | Proximity of sensitive receptors, including ecological receptors, and to the extent to which adverse emissions/odour can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles.                             |
| <b>Vermin and birds</b>  | Proximity of sensitive receptors, types of facility and waste managed at site.  |
| <b>Noise, light and vibration</b>  | The operation of large waste management facilities can produce noise affecting both inside and outside of buildings, including noise and vibration from good vehicle traffic. Intermittent and sustained operating noise may be a problem if not properly |

| Criteria                    | Considerations (See Appendix B of NPPW for further information)   |
|-----------------------------|---|
|                             | managed particularly if night-time working is involved. Potential light pollution effects also need to be considered.                             |
| Litter                      | Can be of concern at some waste management facilities   |
| Potential land use conflict | Likely proposed development in the vicinity of the location under consideration should be taken into account in considering the site suitability. |

### 3a) Scoring and site ranking

To rationalise the list of sites a scoring or ranking exercise should be undertaken, using objective weighting criteria (for example, those set out above) to score/rank each site.

#### Example 1 – Site scoring

This scoring system is based on the degree of difficulty in overcoming a particular constraint by mitigation or design rather than how the constraint is measured against other constraints. The site with a high score is more appropriate than a site with a low score, however care must be taken within the interpretation of the scores as the criteria are not necessarily comparable.

| Score | Interpretation  |
|-------|---|
| -1    | Site has significant constraints  |
| 0     | The site has constraints which could be overcome by mitigation and/or design measures |
| +1    | Site is strongly suitable   |

#### Example 2 – Ranking based on specific criteria

For sites which have specific requirements, a simple ranking system can be used to assess the identified sites against the relevant criteria. The table has been colour coded to show each site against the key criteria. Green shows compliance and red shows non-compliance.

| Site              | Area (Ha) | Within AONB | Distance to waste (km) | Proximity to sensitive receptors | Score |
|-------------------|-----------|-------------|------------------------|----------------------------------|-------|
| Thresholds        | >1ha      | No          | <10km                  | >250m                            |       |
| Identified Site 1 | 1.2       | Yes         | 8                      | >250m                            | 3     |
| Identified Site 2 | 0.1       | No          | 26                     | <250m                            | 1     |
| Identified Site 3 | 6         | Yes         | 7                      | <250m                            | 2     |
| Identified Site 4 | 0.2       | No          | 28                     | >250m                            | 2     |

#### **4) Site Preference and Deliverability**

The final stage of the evaluation process should comprise of an overview of the identified alternative sites and the preferred option. An individual assessment should be provided for each site identified, which is likely to be informed by a site visit, and details of the availability of the site for development should also be discussed.

##### **Overview of document**

The purpose of this document is to provide guidance to applicants and agents on the preparation of an Alternative Site Assessment, the advice contained within this document does not prejudice, nor is binding upon, any future decision taken by Surrey County Council or its Planning Committee.

This document will be regularly monitored and subject to periodic review.

Should you have any feedback or questions relating to this document and the information contained please contact our Technical Support Team on 020 8541 9897 or [mwcd@surreycc.gov.uk](mailto:mwcd@surreycc.gov.uk)

## Appendix 2 – Sailing Suitability Requirements Report prepared by Peter Bentley Limited (August 2025)

## Appendix 3 – Schedule of Accommodation (Existing and Proposed)



Hillington Water Sports Facility and Activity Centre (HWAAC)

Schedule of Accommodation (SOA)

1329-HAV-XX-XX-SH-A-S2 -0011

Haverstock

Issued by SM

Revision series -

Date 05.08.25

Revision Description Issued for Planning

| BLDG NO. | ACTIVITY TYPE                   | GIA  | EXTERNAL | Building areas of previous proposal             | sqm  |
|----------|---------------------------------|------|----------|---|------|
| 1        | CAMP ZONE                       | 198  | 284      | Operations zone - main building                 | 2485 |
| 2        | Operations zone (main building) | 2029 | 591      | Play zone - Activity shelters (land activities) | 439  |
| 3        | Safety zone                     | 1225 | 392      | Sleep zone                                      | 96   |
| 3        | Anglers' Facilities             | 24   | 28       | Safety zone (1) workshop                        | 698  |
|          |                                 |      |          | Safety zone (2) safety equipment                | 758  |
|          |                                 |      |          | Safety zone (3) internal boat store             | 45   |
|          |                                 |      |          | Anglers store                                   | 22   |
|          |                                 |      |          | Energy centre                                   | 101  |
|          | Totals                          | 3476 | 1295     | Totals  | 4644 |

| Building        | GIA  | GEA  |
|-----------------|------|------|
| Camp Zone       | 198  | 224  |
| Operations Zone | 2029 | 2217 |
| Safety Zone     | 1225 | 1321 |
| Facilities      | 24   | 40   |
| Totals          | 3476 | 3802 |

| ACTIVITY REF | BUILDING NAME | INTERNAL | EXTERNAL | ROOM DESCRIPTION | Present at HOAC | HOAC sqm | Present at BSC | BSC sqm | Present at CVSS / BLYM | CVSS / BLYM sqm | Present at ORCHYD | ORCHYD sqm | JUSTIFICATION |
|--------------|---------------|----------|----------|------------------|-----------------|----------|----------------|---------|------------------------|-----------------|-------------------|------------|---------------|
|--------------|---------------|----------|----------|------------------|-----------------|----------|----------------|---------|------------------------|-----------------|-------------------|------------|---------------|

|   |                  |    |  |  |   |  |   |  |   |  |   |  |  |
|---|------------------|----|--|--|---|--|---|--|---|--|---|--|--|
| 1 | CAMP ZONE        |    |  |  |   |  |   |  |   |  |   |  |  |
|   | WCs 7 (cubicles) | 28 |  | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant                      | ✓ |  | ✗ |  | ✗ |  | ✗ |  | The size of the WCs are in line with Building Regulations Part T (2024) and Sport England Guidance 2024 (AISF D).<br><br>This is a very large site with the development quite spread out. Additional WCs are therefore required due to the distance between the sleep zone and the main building. Some users of the site will not be able to walk a long distance to use the WCs. The design of the WCs ensure that they can be used by all genders, even if there is a minority split with the group on site.   |
|   | WCs 8 (cubicles) | 28 |  | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant                      | ✓ |  | ✗ |  | ✗ |  | ✗ |  | The previous Dews Lane facility did not have Enclosed Toilets. The size of the Enclosed Toilet is compliant with Building Regulations Part T (2024), British Standard (BS)8300 (Accessibility), BS30416 (Menstrual Health), PAS6463 (Public Accessible Standard) (Design of the Mind) and Sport England Guidance 2024 (AISF D).  |
|   | Superloo (SL)    | 3  |  | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use) | ✗ |  | ✗ |  | ✗ |  | ✗ |  | ASID Part D 2.3.3 states:<br>"In addition to separate male, female and accessible toilet provision, there should always be some all-gender toilet provision."  |
|   | Superloo (SL)    | 4  |  | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use) | ✗ |  | ✗ |  | ✗ |  | ✗ |  | BB103 states:<br>"Separate toilets for staff: at least one toilet with wash hand basin plus one for every 25 full-time equivalent members of staff"<br><br>BS 30416 Menstruation states:<br>"Options that can be implemented to help employees manage symptoms include... Ease of access to toilet or shower facilities, and where possible, some self-contained toilet facilities with washbasins inside the cubicles."<br><br>The provision of Enclosed Toilets is also a minimum requirement for LBH as a public body and for Sport England. The design of the Enclosed |
|   | Accessible WC    | 5  |  | Sport England ref with baby change   | ✓ |  | ✗ |  | ✗ |  | ✗ |  | The size of the accessible WCs are in line with Building Regulations Part T (2024). There was one accessible WC at the previous Dews Lane facility, however the size of the cubicle did not meet Building Regulations and did not  |

|                        |    |   |   |   |    |   |    |   |  |   |  |   |
|------------------------|----|---|---|---|----|---|----|---|--|---|--|---|
| Changing room 5        | 26 |   | Allow for 30 pax to change  | ✓ | 39 | ✓ | 22 | ✗ |  | ✗ |  | <p>The size of the changing room and showers are in line with Sport England Guidance 2024 (AISF D) which requires 1 sqm per child. As per AISF D guidance, the changing rooms have been designed to accommodate benches with a minimum width allowance of 500mm per person, which based on a group of 30 equates to bench area of 7.5m2 per changing room. As per AISF D 1.8, the changing rooms have been designed to provide adequate space in circulation areas to allow all users to move around comfortably and to allow wheelchair users to access all changing areas; general circulation within changing areas therefore typically achieves 1500mm minimum.</p> <p>As per AISF D 2.2, all shower areas include at least one ambulant accessible cubicle, at least 1000mm wide with appropriate grab rails. As per AISF D 1.7.5, as the changing is provided in an open arrangement, at least one private changing cubicle has been proposed to provide additional privacy and security to those who may need / want it.</p> <p>Shower numbers have been derived from BS6465-1 which requires 1 shower per 10 people.</p> <p>The Department for Education (DfE) recommends that showers should generally be in the form of separate cubicles for privacy reasons. This is also set out in the NHS guidance for vulnerable adults. Sport England Guidance (2024) requires a specific design for changing rooms and shower facilities. LBH are also required to meet these standards as a public body. The proposed facilities meet these standards.</p> |
| Changing room 6        | 26 |   | Allow for 30 pax to change  | ✓ |    | ✗ |    | ✗ |  | ✗ |  | <p>There were a total of four changing rooms at the previous Dews Lane facility. Two changing rooms were located in a portacabin and two changing rooms were located within the main building. As per the standards for the proposed development, the space requirement is 1 sqm per child and the previous Dews Lane facility was being used by c. 30 children at a time. Two of the changing rooms measured at 5 sqm each, which was a sufficient size. Two of the changing rooms measured at 2 sqm each, which was not a sufficient size.</p>  |
| Shower room            | 2  |   | Off changing room 7   | ✗ |    | ✗ |    | ✗ |  | ✗ |  |   |
| Shower room            | 2  |   | Off changing room 7   | ✗ |    | ✗ |    | ✗ |  | ✗ |  |   |
| Shower room            | 2  |   | Off changing room 8   | ✗ |    | ✗ |    | ✗ |  | ✗ |  |   |
| Shower room            | 2  |   | Off changing room 8   | ✗ |    | ✗ |    | ✗ |  | ✗ |  |   |
| Shower and change      | 5  |   | Allow for bench, clothes hook and grab rails  | ✗ |    |   |    |   |  |   |  |   |
| Shower and change      | 5  |   | Allow for bench, clothes hook and grab rails  | ✗ |    |   |    |   |  |   |  |   |
| Family change          | 7  |   | To allow minority students, staff to use. Space for a buggy, bench, hooks. Baby change and baby feeding facilities. | ✗ |    | ✗ |    | ✗ |  | ✗ |  | <p>The proposed family changing room could be used for:</p> <ul style="list-style-type: none"><li>-Baby feeding and changing;</li><li>-A child who is WC training (due to a lower pan height); and</li><li>-Inter-gender changing and WC use (e.g. father and daughter or mother and son).</li></ul> <p>The previous Dews Lane facility did not contain a family changing room.</p> <p>The provision of a family change is as per AISF Part D 2.7 Facilities for baby changing should generally be provided and at least one should be an all-gender wheelchair accessible facility - see Figures D32 and D33 (including an accessible WC pan and basin within an accessible baby change is highly beneficial for convenience of disabled adults with young children). Baby changing should not be added to</p>   |
| Accessible hygiene     | 13 |   | Changing Places   | ✗ |    | ✗ |    | ✗ |  | ✗ |  | <p>An accessible hygiene (changing places) room has been a Building Regulation requirement since 2021 under Part M. It is a minimum requirement for public buildings. These buildings must have at least one Accessible Hygiene (Changing Places) room which is a well-equipped WC facility that measures at least 12 sqm (GIA). The Equality Act (2010) also requires service providers to make reasonable changes to their built environment to accommodate disabled users.</p> <p>A hoist system will be installed for those with accessibility needs in line with Building Regulation 102, which requires a fixed hoist system</p>  |
| General store          | 3  |   | For equipment storage   | ✓ |    |   |    |   |  |   |  |   |
| Cleaners store         | 2  |   |   | ✗ |    | ✗ |    | ✗ |  | ✗ |  | <p>This is a very large site with development quite spread out. Several cleaners stores are therefore required due to the distance between each building.</p> <p>The previous Dews Lane facility did not contain a cleaners store.</p>  |
| Plant room             | 2  |   | UFH and other localised equipment   | ✗ |    | ✗ |    | ✗ |  | ✗ |  | <p>This is a very large site with development quite spread out. Several plant rooms are therefore required due to the distance between each building. A plant room is also a requirement of a modern building as it houses equipment that keeps a building's system running.</p> <p>The previous Dews Lane facility did not contain a plant room.</p>   |
| Secure equipment store | 6  |   |   | ✓ |    | ✗ |    | ✗ |  | ✗ |  | <p>A secure equipment store is necessary as there will be safety equipment and activity equipment that will need to be stored on site. A secure store means that the equipment will not be tampered with, damaged or stolen.</p> <p>The previous Dews Lane facility did store equipment, but this consisted of several informal storage locations which were not secure.</p>  |
| Handwashing            |    | 4 |   | ✓ | 4  | ✗ |    | ✗ |  | ✗ |  | <p>The proposed hand-washing area is a like-for-like replacement of the previous Dews Lane facility.</p>  |

|                               |     |     |   |     |    |     |  |     |  |     |  |   |
|-------------------------------|-----|-----|---|-----|----|-----|--|-----|--|-----|--|---|
| Food preparation              |     | 9   |   | ✓   | 12 | ✗   |  | ✗   |  | ✗   |  | The food preparation is required so that both adults and children can prepare simple meals. There will be no fridges located within the food preparation area as this is an external area. The fridges will be located in the main building, in line with the Food Standards Agency requirements.<br>The previous Dews Lane facility did contain a small food preparation   |
| Main activity shelter (1)     |     | 109 | 60 people capacity, artificially lit, not heated, area for first aid, 1 wall (wind shelter from south west). Food prep, hand washing facilities. Power and data here. | ✓   | 77 | ✓   |  | ✗   |  | ✗   |  | The main shelter is required for emergency mustering and for first aid purposes for those camping overnight (both staff and children). In the event of an emergency, children must be evacuated to a sheltered area where there is a concrete floor and sufficient external lighting. This is to ensure that first aid can take place, if required.<br>The main shelter is proposed to be located close to the sleep zone so that in the case of an emergency, first aid can be undertaken close to the sleep zone, rather than in the main building which is quite a distance away.<br>The previous Dews Lane facility included seven external shelters. Some of these were demolished during the Dews Lane operation, primarily due to the construction of HS2. |
| Sheltered walkway             |     | 57  |   | ✗   |    | ✗   |  | ✗   |  | ✗   |  | A sheltered walkway is proposed to be located outside of the standard WCs and changing room and shower facilities. It will provide sheltered access to other areas of the site.   |
| Shelter 2                     |     |     | Located at archery. Allow for 30. people. Roof and 2 no. walls.   | ✓   |    | ✗   |  | ✗   |  | ✗   |  |   |
| Shelter 3                     |     | 5   | Located at woodland activities. Allow for 30. people. Roof and 2 no. walls.   | ✓   |    | ✗   |  | ✗   |  | ✗   |  |   |
| Shelter 4                     |     |     | Located at end of zip line. Allow for 30. people. Roof and 1 no. walls.   | ✓   |    | ✗   |  | ✗   |  | ✗   |  |   |
| Shelter 5                     |     |     | Located at high ropes and pedal karting. Allow for 30. people. Roof and 1 no. walls.  | ✓   |    | ✗   |  | ✗   |  | ✗   |  |   |
| Bird hide                     |     | 20  | A bird hide at water edge. Allow 10 people. Roof and 3 no. walls.   | ✓   |    | ✗   |  | ✗   |  | ✗   |  | A bird hide is often used to observe wildlife, especially birds. The bird hide activity shelter will provide space for this activity.<br>The previous Dews Lane facility did not contain a bird hide activity centre.   |
| Shelter 7 - at main building  |     | 20  | Located at beach. Allow for 30 people. Roof and 1 wall.   | ✓   |    | ✗   |  | ✗   |  | ✓   |  |   |
| Shelter 8 - at main building  |     | 20  | Located at the Anchorage. A sail shade / roof only to allow 30 people to gather.  | ✓   |    | ✗   |  | ✗   |  | ✗   |  |   |
| Shelter 9 - at main building  |     | 20  | Located at Little Denmark. A sail shade / roof only to allow 20 people to gather.   | ✗   |    | ✗   |  | ✓   |  | ✗   |  |   |
| Shelter 10 - at main building |     | 20  | Located at Little Denmark. A sail shade / roof only to allow 20 people to gather.   | ✗   |    | ✗   |  | ✓   |  | ✗   |  |   |
| Partitions                    | 27  |     |   | n/a |    | n/a |  | n/a |  | n/a |  |   |
| Circulation 1                 | 0   |     |   | n/a |    | n/a |  | n/a |  | n/a |  |   |
| Gross Area                    | 198 | 284 |   |     |    |     |  |     |  |     |  |   |

2

OPERATIONS ZONE (MAIN BUILDING)

|                                     |     |  |   |   |    |   |    |   |  |   |  |  |
|-------------------------------------|-----|--|---|---|----|---|----|---|--|---|--|--|
| Accessible camping and support room | 144 |  | Accessible camping for up to 10 children and 2no. Healthcare professionals            | ✗ |    | ✗ |    | ✗ |  | ✓ |  | Existing facilities use additional room for rowing, which is not a requirement of new brief. Accessible camping is required to align with Equality Act - providing facilities to all protected characteristic groups.<br>The proposed accessible camping and support room will allow those with accessibility needs to have a camping experience. If required, the room can be split so that it can used by all ages, genders and ethnicities. Given the size of the site, there is a requirement to have two Health Care Professionals on site at all times. If either or both of the medical practitioners require accessible accommodation, then this area can be used. Adults managing the children will sleep in the support room, close enough to hear whilst having a good level of privacy. The previous Dews Lane facility did not have accessible camping provision or a support room. Discussions have taken place with Orchyd (a charity for children with disabilities) who previously used the Dews Lane facility. Orchyd advised that they could only visit the facility in the day-time as there were no accessible sleeping arrangements. Orchyd also confirmed that the majority of activities had to take place externally as many of the children could not access the internal building. Each year, they take up to 20 children, aged 8-12 years old, for between 10-14 days. Many of the children have high medical needs, which are transferred to special requirements in their sleeping, feeding and toileting requirements. Approx. 50% of children will need a wheelchair, for either some or all of their time. Some of the wheelchair users will have multiple devices, including shower chairs, indoor and outdoor chairs etc. Therefore the area required for this room has been heavily derived by Approved Document M, Diagram 17, which states 1500mm should be allowed for a wheelchair user to manoeuvre at the side of a bed and at least 700mm should be allowed between beds. |
| Activities room                     | 142 |  | Accessible camping for up to 10 children. Also used to host some internal activities. | ✓ | 75 | ✗ |    | ✓ |  | ✓ |  | The activities room is proposed to host some of the internal activities that are proposed as part of the development. The Dews Lane facility had an activities room. The proposed activities room measures slightly more as the site is larger and the average number of people using the site at one time (e.g.200) has increased.  |
| Galley kitchen                      | 45  |  | To prep hot food.   | ✓ | 16 | ✓ | 20 | ✓ |  | ✓ |  | A galley kitchen is required to feed visitors and users of the site. The galley kitchen will be used for food preparation and will be an adults-only area.<br>The accessible camping and visitor cohort may have higher food needs (how food is prepared, allergies etc). Users and visitors to the site may also have dietary requirements (e.g. allergies or religious requirements). As such, a galley kitchen, with a fridge and storage is proposed, in line with the requirements of the Food Standards Agency. The Dews Lane site did not contain a galley kitchen. All food was prepared in the handwashing area, which had no fridges or storage.<br><br>The size of the kitchen has also been derived by BB103 which states: The minimum size for a full service kitchen is 30m2 + 0.08m2 for every pupil dining on site.<br><br>Based on 200 students, a full service kitchen would need to be minimum 30m2 + 0.08m2 = 30.8m2   |
| Dry store                           | 3   |  |   | ✗ |    | ✗ |    | ✗ |  | ✓ |  | The dry store is an adults-only area and will be used in conjunction with the galley kitchen. A dry store is required to meet the requirements of the Food Standards Agency. The dry store will be secure to ensure adult-only access.<br>The previous Dews Lane facility did not contain a dry store.   |
| Kitchen WC                          | 5   |  | Staff WC with lobby, to satisfy food safety standards. Lockers for staff possessions. | ✗ |    | ✗ |    | ✗ |  | ✗ |  | The kitchen WC is for adults-only who have been using the galley kitchen. A kitchen WC is a Food Standards Agency requirement. The kitchen WC will also include a locker for those using the galley kitchen.<br>The previous Dews Lane facility did not contain a kitchen WC.  |
| Play store                          | 4   |  |   | ✓ | 4  | ✗ |    | ✗ |  | ✓ |  | The play store is required to securely store equipment associated with the activities on site. It will also provide a temporary sensory space for SEN needs.<br>A secure store means that the equipment will not be tampered with, damaged or stolen.<br>The previous Dews Lane facility did store equipment, but this consisted of several informal storage locations which were not secure   |
| Day store                           | 9   |  |   | ✓ | 5  | ✓ |    | ✓ |  | ✓ |  | The day store is required to securely store equipment associated with the activities on site.<br>A secure store means that the equipment will not be tampered with, damaged or stolen.<br>The previous Dews Lane facility did store equipment, but this consisted of several informal storage locations which were not secure  |

|  |     |  |  |   |    |   |    |   |  |   |   |   |
|--|-----|--|--|---|----|---|----|---|--|---|---|---|
| Support store / Mobility Store         | 14  |  |  | ✕ |    | ✕ |    | ✕ |  | ✓ |   | The mobility store is required to store linen, towels and assistance equipment (e.g. sling for a hoist, indoor wheelchairs, outdoor wheelchairs, feeding chairs etc). This is proposed to be located close to the accessible camping room for easy access to supplies. It is also required for the hygienic storage of cleaned equipment and quarantine of fouled equipment.<br>The previous Dews Lane facility did not contain a mobility store.   |
| Crew / Wellbeing Room                  | 51  |  | Space for members to sit, gather before and after sailing. Also doubles as additional space during                                   | ✕ |    | ✓ | 50 | ✓ |  | ✕ | ? | The proposed crew room is a like-for-like replacement of the previous Broadwater Sailing Club facility.   |
| Medical treatment (first aid/sick bay) | 17  |  | Allow for 3 people to be treated by one person, with due dignity given to each (different genders, age groups, states of undress)    | ✕ |    | ✕ |    | ✓ |  | ✓ |   | BB104 requires a medical treatment room (15 to 20m2) for the treatment and care of pupils but also functioning as a sick room, to have a lockable fridge and easy access to an accessible WC.<br><br>NHS England Core Elements Health Building Note 00-03:Clinical and clinical support spaces advises a consultation/examination room is at least 16m2.<br><br>A medical treatment (first aid / sick bay) room is a DfE and Health and Safety England requirement. It will allow the safe storage of medicines.<br>The room will be designed so that users can be medically treated in private and with dignity and to ensure that the person(s) being treated are safeguarded and protected. This needs to be a relatively large room so that more than one person can be treated at the same time, whilst taking into account diverse ages, genders, religions etc. Two adults will also need to be present, so space will be required for this provision.<br>The previous Dews Lane facility did not have a medical treatment room. |
| Entrance Lobby                         | 30  |  |  | ✕ |    | ✕ |    | ✕ |  | ✓ |   | A number of visitors are expected to come to the site. As such, an entrance lobby, with a reception area is required. This is not out of the ordinary for a modern building where there will be a number of visitors.<br>The previous Dews Lane facility did not contain an entrance. There was a reception desk, but this was accessed via the staff room, which is not a sufficient way of dealing with visitors.   |
| Main office and reception              | 100 |  | With reception desk. 6 no. desks.  | ✓ | 52 | ✕ |    | ✕ |  | ✓ |   | The proposed main office is a like-for-like replacement of the previous Dews Lane facility.<br>Existing description: 6 desks. Kitchenette included in footprint, with   |
| Plant room                             | 8   |  | Small plant room for UFH manifolds and localised equipment.  | ✕ |    | ✕ |    | ✕ |  | ✕ |   | This is a very large site with development quite spread out. Several plant rooms are therefore required due to the distance between each building. A plant room is also a requirement of a modern building as it houses equipment that keeps a building's system running.<br>The previous Dews Lane facility did not contain a plant room.  |
| Cleaners store                         | 2   |  |  | ✕ |    | ✕ |    | ✕ |  | ✕ |   | This is a very large site with development quite spread out. Several cleaners stores are therefore required due to the distance between each building.<br>The previous Dews Lane facility did not contain a cleaners store.   |
| Laundry                                | 20  |  | Serving accessible camping and seasonal staff. Direct access to outside and washing line. Sized to accommodate a 1500 turning circle | ✓ | 5  | ✕ |    | ✕ |  | ✕ |   | The laundry room is required for staff using the seasonal accommodation. Support workers may also have to do laundry for SEN users of the site.<br>The previous Dews Lane facility did contain a laundry room.  |
| Accessible hygiene (changing places)   | 15  |  | Space to allow a person and their carer(s) to wash, change and access sanitary facilities.   | ✕ |    | ✕ |    | ✕ |  | ✕ |   | An accessible hygiene (changing places) room has been a Building Regulation requirement since 2021 under Part M. It is a minimum requirement for public buildings. These buildings must have at least one Accessible Hygiene (Changing Places) room which is a well-equipped WC facility that measures at least 12 sqm (GIA). The Equality Act (2010) also requires service providers to make reasonable changes to their built environment to accommodate disabled users.<br>A hoist system will be installed for those with accessibility needs in line with Building Bulletin 103 which requires a fixed or mobile hoist system and space for carers to change and assist students.<br>The previous Dews Lane facility did not contain an Accessible Hygiene (Changing Places) room.   |

|                               |     |    |  |     |     |     |    |     |  |     |   |   |
|-------------------------------|-----|----|--|-----|-----|-----|----|-----|--|-----|---|---|
| Superloo (SL)                 | 4   |    | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use) | ✖   |     | ✖   |    | ✖   |  | ✖   |   | The previous Dews Lane facility did not have Enclosed Toilets. The size of the Enclosed Toilet is compliant with Building Regulations Part T (2024), British Standard (BS)8300 (Accessibility), BS30416 (Menstrual Health) and PAS6463 (Public Accessible Standard) (Design of the Mind). The provision of Enclosed Toilets is also a minimum requirement for LBH as a public body and for Sport England. The design of the Enclosed Toilets ensure that they can be used by all genders, even if there is a minority split with the group on site.   |
| WC (SL)                       | 3   |    | A cubicle with WC, basin.  | ✖   |     | ✓   |    | ✓   |  | ✖   |   | The size of the WCs are in line with Building Regulations Part T (2024) and Sport England Guidance 2024 (AISF D). This is a very large site with the development quite spread out. Additional WCs are therefore required due to the distance between each part of the site. Some users of the site will not be able to walk a long distance to use the WCs.   |
| WC (SL)                       | 3   |    | A cubicle with WC, basin.  | ✖   |     | ✓   |    | ✓   |  | ✖   |   | The design of the WCs ensure that they can be used by all genders, even if there is a minority split with the group on site.  |
| Accessible WC                 | 5   |    | Sport England ref with baby change   | ✖   |     | ?   |    | ✓   |  | ✓   |   | The size of the accessible WCs are in line with Building Regulations Part T (2024).   |
| The Hull                      |     | 83 | Gathering space, under cover, at centre of building.                                       | ✖   | 350 | ✓   |    | ✓   |  | ✖   |   | There was one accessible WC at the previous Dews Lane facility, however The Hull is a covered, external area which is proposed to be used for briefings, presentations and meet and greet. The previous Dews Lane facility contained a similar external area, however this was not covered.   |
| Net area                      | 624 | 83 |  |     | 157 |     |    |     |  |     | 0 |   |
| Partitions                    | 37  |    |  | n/a |     | n/a |    | n/a |  | n/a |   |   |
| Stair                         | 0   |    |  | ✖   |     | ✖   |    | ✖   |  | ✖   |   |   |
| Lift A                        | 4   |    |  | ✖   |     | ✖   |    | ✖   |  | ✖   |   | Lift A can accommodate two carers and a wheelchair user. The previous Dews Lane facility was ground floor level only, so did not require a lift.  |
| Circulation                   | 43  |    |  | n/a |     | n/a |    | n/a |  | n/a |   |   |
| Gross area (North Quarter GF) | 708 | 83 |  |     | 157 |     | 70 |     |  |     | 0 |   |
|                               |     |    |  |     |     |     |    |     |  |     |   |   |
| WCs 1 (cubicles)              | 28  |    | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant                      | ✓   |     | ✖   | 50 | ✖   |  | ✓   |   | The size of the WCs are in line with Building Regulations Part T (2024). This is a very large site with the development quite spread out. Additional WCs are therefore required due to the distance between each part of the site. Some users of the site will not be able to walk a long distance to use the WCs. The design of the WCs ensure that they can be used by all genders, even if there is a minority split with the group on site.<br><br>WCs numbers have been calculated using BB104, BB103 and BS6465-1 guidance and the existing ratios of changing/WCs at the previous Dews Lane Facility.<br><br>BB104 and BS 6465-1 state:<br>"For special schools, SRP and Units where pupils are less independent, and for pupils aged two to four in any setting, approximately one fitting for every 10 (fulltime equivalent) pupil places in total (where hygiene rooms are provided all but one of these can be counted towards this number)"<br><br>BB103 states:<br>"Toilets for pupils: this should provide approximately one for every 20 pupils in total, but there must be one for every ten full-time equivalent pupils aged two to four, including reception and nursery places,"<br><br>BS6465-1 states:<br>"1 WC per 15 pupils over 5 years for primary"<br><br>The 2no of the existing HOAC changing rooms currently have 5no WCs per changing room for 30. Therefore the proposal is a reprovision. |

|                                      |    |  |  |   |    |   |   |   |  |
|--------------------------------------|----|--|--|---|----|---|---|---|--|
| Superloo (SL)                        | 3  |  | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use)   | ✓ | 33 | ✗ | ✓ | ✗ | <p>The previous Dews Lane facility did not have Enclosed Toilets. The size of the Enclosed Toilet is compliant with Building Regulations Part T (2024), British Standard (BS)8300 (Accessibility), BS30416 (Menstrual Health), PAS6463 (Public Accessible Standard) (Design of the Mind) and Sport England Guidance 2024 (AISF D).</p> <p>ASID Part D 2.3.3 states:<br/>"In addition to separate male, female and accessible toilet provision, there should always be some all-gender toilet provision."</p> <p>BB103 states:<br/>"Separate toilets for staff: at least one toilet with wash hand basin plus one for every 25 full-time equivalent members of staff"</p> <p>BS 30416 Menstruation states:<br/>"Options that can be implemented to help employees manage symptoms include... Ease of access to toilet or shower facilities, and where possible, some self-contained toilet facilities with washbasins inside the cubicles."</p> <p>The provision of Enclosed Toilets is also a minimum requirement for LBH as a public body and for Sport England. The design of the Enclosed Toilets ensure that they can be used by all genders, even if there is a</p> |
| WCs 2 (cubicles)                     | 28 |  | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant  | ✓ |    | ✗ | ✗ | ✓ | As above   |
| WCs 3 (cubicles)                     | 28 |  | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant  | ✗ |    | ✓ | ✗ | ✗ | As above   |
| Superloo (SL)                        | 4  |  | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use)   | ✗ |    | ✗ | ✓ | ✗ | As above   |
| WCs 4 (cubicles)                     | 28 |  | Allow for 5 no. pans and handwashing facilities, incl. 1 non ambulant  | ✗ |    | ✓ | ✗ | ✗ | As above   |
| Superloo (SL)                        | 4  |  | A cubicle with WC, basin, shelf and other accessible features (but not for wheelchair use)   | ✗ |    | ✗ | ✓ | ✗ | As above   |
| Changing room 1                      | 29 |  | Allow for 30 pax to change, no shower provision.   | ✓ | 44 | ✓ | ✓ | ✗ | Existing primary changing facilities - 2 rooms - Not an even gender split. 70:30   |
| Individual shower cubicle            | 3  |  | Individual shower  | ✓ |    | ✓ | ✓ | ✗ | Both inadequate for no.s on site. 1 x (30 children) classes + adults + instructors capacity - to each room - not in line with best practice. Boys side had open shower - Six shower heads.   |
| Individual shower cubicle            | 2  |  | Individual shower  | ✗ |    | ✓ | ✓ | ✗ |  |
| Individual shower and change cubicle | 5  |  | Accessible shower with bench   | ✗ |    | ✗ | ✗ | ✗ | The size of the changing room and showers are in line with Sport England Guidance 2024 (AISF D) which requires 1 sqm per child. As per AISF D guidance, the changing rooms have been designed to accommodate benches with a minimum width allowance of 500mm per person, which based on a group of 30 equates to bench area of 7.5m2 per changing room. As per AISF D 1.8, the changing rooms have been designed to provide adequate space in circulation areas to allow all users to move around comfortably nd to allow wheelchair users to access all changing areas; general circulation within changing areas therefore typically achieves 1500mm minimum. Sport England Guidance (2024) requires a specific design for changing rooms and shower facilities. LBH are also required to meet these standards as a public body. The proposed facilities meet these standards.   |
| Changing room 2                      | 30 |  | Allow for 30 pax to change, no shower provision.   | ✓ |    | ✓ | ✓ | ✗ |  |
| Individual shower cubicle            | 2  |  | Individual shower  | ✓ |    | ✓ | ✓ | ✗ |  |
| Individual shower cubicle            | 2  |  | Individual shower  | ✗ |    | ✓ | ✓ | ✗ |  |
| Individual shower and change cubicle | 5  |  | Accessible shower with bench   |   |    |   |   |   |  |
| Changing room 3                      | 30 |  | Allow for 30 pax to change, no shower provision.   | ✓ |    | ✗ | ✓ | ✗ |  |
| Individual shower cubicle            | 2  |  | Individual shower  | ✗ |    | ✗ | ✓ | ✗ | As per AISF D 2.2, all shower areas include at least one ambulant accessible cubicle, at least 1000mm wide with appropriate grab rails. As per AISF D 1.7.5, as the changing is provided in an open arrangement, at least one private changing cubicle has been proposed to provide additional privacy and security to those who may need / want it.   |
| Individual shower cubicle            | 2  |  | Individual shower  | ✗ |    | ✗ | ✓ | ✗ |  |
| Individual shower and change cubicle | 5  |  | Accessible shower with bench   |   |    |   |   |   |  |
| Changing room 4                      | 30 |  | Allow for 30 pax to change, no shower provision.   | ✓ |    | ✗ | ✓ | ✗ | Shower numbers have been derived from BS6465-1 which requires 1 shower per 10 people. The Department for Education (DfE) recommends that showers should generally be in the form of separate cubicles for privacy reasons. This is also set out in the NHS guidance for vulnerable adults.   |
| Individual shower cubicle            | 4  |  | Individual shower  | ✗ |    | ✗ | ✓ | ✗ |  |
| Individual shower cubicle            | 4  |  | Individual shower  | ✗ |    | ✗ | ✓ | ✗ | There were a total of four changing rooms at the previous Dews Lane facility. Two changing rooms were located in a portacabin and two changing rooms were located within the main building. As per the standards for the proposed development, the space requirement is 1 sqm per child and the previous Dews Lane facility was being used by c. 30 children at a time. Two of the changing rooms measured at 5 sqm each, which was a sufficient size. Two of the changing rooms measured at 2 sqm each, which was not a sufficient size. All four changing rooms at the previous Dews Lane facility were  |
| Family change                        | 5  |  | To allow minority students, staff to use. Menstrual health considerations. Allow for buggy to be brought in. Baby change facilities. | ✗ |    | ✗ | ✗ | ✗ | The proposed family changing room could be used for:<br>-Baby feeding and changing;<br>-A child who is WC training (due to a lower pan height); and<br>-Inter-gender changing and WC use (e.g. father and daughter or mother and son).<br>The previous Dews Lane facility did not contain a family changing room.  |

|                                      |     |    |  |     |    |     |  |     |  |     |   |  |
|--------------------------------------|-----|----|--|-----|----|-----|--|-----|--|-----|---|--|
| Family change                        | 8   |    | To allow minority students, staff to use. Menstrual health considerations. Allow for buggy to be brought in. Baby change facilities.           | ✖   |    | ✖   |  | ✖   |  | ✖   |   | Facilities for baby changing should generally be provided and at least one should be an all-gender wheelchair accessible facility - see Figures D32 and D33 (including an accessible WC pan and basin within an accessible baby change is highly beneficial for convenience of disabled adults with young children). Baby changing should not be added to designated wheelchair accessible toilets as this can create longer queues.   |
| Accessible change, shower, WC        | 8   |    |  | ✖   |    | ✖   |  | ✓   |  | ✓   |   | The inclusion of an accessible change, shower, WC is a sport England recommendation. The size of this room has been derived by Approved Document M   |
| Accessible Hygiene (Changing Places) | 14  |    | To allow for fully accessible facilities, for both independent users and those needing additional carer assistance                             | ✖   |    | ✖   |  | ✖   |  | ✖   |   | An accessible hygiene (changing places) room has been a Building Regulation requirement since 2021 under Part M. It is a minimum requirement for public buildings. These buildings must have at least one Accessible Hygiene (Changing Places) room which is a well-equipped WC facility that measures at least 12 sqm (GIA). The Equality Act (2010) also requires service providers to make reasonable changes to their built environment to accommodate disabled users. A hoist system will be installed for those with accessibility needs in line with Building Bulletin 103 which requires a fixed or mobile hoist   |
| Cleaners store A                     | 3   |    |  | ✖   |    | ✖   |  | ✖   |  | ✖   |   | This is a very large site with development quite spread out. Several cleaners stores are therefore required due to the distance between each building. The previous Dews Lane facility did not contain a cleaners store.   |
| Plant room A                         | 11  |    | Small plant room for UFH manifolds and localised equipment.  | ✖   |    | ✖   |  | ✖   |  | ✖   |   | This is a very large site with development quite spread out. Several plant rooms are therefore required due to the distance between each building. A plant room is also a requirement of a modern building as it houses equipment that keeps a building's system running. The previous Dews Lane facility did not contain a plant room.  |
| Colonnade                            |     | 71 | Circulation space, covered, leading up to reception  | ✖   |    | ✖   |  | ✖   |  | ✖   |   | To provide a covered entrance-way for visitors as they approach the main reception   |
| WC External Circulation              |     | 36 | External covered space with benches outside of changing rooms / WCs  |     |    |     |  |     |  |     |   |  |
| Net area                             | 327 | 71 |  |     | 77 |     |  |     |  |     | 0 |  |
| Partitions                           | 35  |    |  | n/a |    | n/a |  | n/a |  | n/a |   |  |
| Circulation 1                        | 14  |    |  | ✖   | ✖  | ✖   |  | ✖   |  | ✖   |   |  |
| Circulation 2                        | 9   |    |  | ✖   | ✖  | ✖   |  | ✖   |  | ✖   |   |  |
| Stair and Lift                       | 27  |    |  | n/a |    | n/a |  | n/a |  | n/a |   |  |
| Gross area (South Quarter GF)        | 412 | 71 |  |     | 77 |     |  |     |  |     | 0 |  |
|                                      |     |    |  |     |    |     |  |     |  |     |   |  |
| Observation Room                     | 190 |    |  | ✖   |    | ✓   |  | ✓   |  | ✖   |   | The observation room is required to facilitate indoor activities such as; indoor archery, rowing and fencing. The room will also be used as temporary laboratory for a Field Study Centre for groups such as local universities. The previous Dews Lane facility did include an observation room but the size of the room meant that it could not be used by those with accessibility requirements. The proposed uplift in floorspace is required to allow flexibility of the space and to ensure that those with accessibility requirements can access it. The chair store is required to store chairs in the event that they are not required by users using areas such as the observation room. |
| Chair Store                          | 6   |    | A shared space, each group will need storage to allow for their equipment and loose furniture to be put away while others are using the space. | ✖   |    | ✖   |  | ✓   |  | ✖   |   | The chair store is required to store chairs in the event that they are not required by users using areas such as the observation room.   |
| Equipment store                      | 20  |    |  | ✖   |    | ✖   |  | ✓   |  | ✖   |   | A secure equipment store is necessary as there will be safety equipment and activity equipment that will need to be stored on site. A secure store means that the equipment will not be tampered with, damaged or stolen. The previous Dews Lane facility did store equipment, but this consisted of several informal storage locations which were not secure.   |
| Operations                           | 29  |    | Needs direct view onto water. To accommodate 4no. Desks + storage  | ✓   | 13 | ✓   |  | ✓   |  | ✖   |   | This is a very large site, so a total of four operational staff will be required to be on-site at all times. Having at least four members of operational staff is a health and safety requirement given that when water-activities are taking place, at least two members of staff have to be located there. The other two members of staff will be located elsewhere on the site. An operations room is required for the operational staff and space is required for furniture such as desks, chairs, PCs etc. The room will be a staff-only area. The previous Dews Lane facility did have an operations room, but this could only fit a maximum of one person at a time.                        |



|                            |                      |     |     |  |     |    |     |    |     |  |     |   |   |
|----------------------------|----------------------|-----|-----|--|-----|----|-----|----|-----|--|-----|---|---|
| First floor north quarter  | Training Room        | 24  |     |  | ✓   | 29 | ✗   |    | ✗   |  | ✗   |   | A training room is required for one-to-one and group training sessions for operational staff.<br>The previous Dews Lane facility did have a training room. This was smaller than the training room proposed given that the site itself was smaller and there were less operational staff at the site.<br>Modular unit.  |
|                            | Pantry               | 15  |     |  | ✗   |    | ✓   |    | ✓   |  | ✗   |   | The pantry will serve the observation room and will be used for the preparation of light refreshments only.<br>The previous Dews Lane facility did not have a pantry.   |
|                            | Server               | 5   |     | Small plant room for UFH manifolds and localised equipment.  | ✗   |    | ?   |    | ?   |  | ✗   |   | A server room is an operational requirement, as the CCTV on the site must be connected to a local server. The server will allow visitors and staff with WIFI. It will also allow Building Management Systems to be installed to remove monitor lifts and to assist with the operation of the energy centre and heating. Remove monitoring provides a lower cost operation option and immediate response to equipment failures such as power supplies to lifts.<br>The previous Dews Lane facility did not have a server room. |
|                            | WCs 5 (cubicles)     | 16  |     | Allow for 2 no. pans and handwashing facilities, incl. 1 non ambulant  | ✗   |    | ✗   |    | ✗   |  | ✗   |   | The size of the WCs are in line with Building Regulations Part T (2024).<br>This is a very large site with the development quite spread out. Additional WCs are therefore required due to the distance between each part of the site. Some users of the site will not be able to walk a long distance to use the WCs.<br>The design of the WCs ensure that they can be used by all genders, even if there is a minority split with the group on site.   |
|                            | WCs 6 (cubicles)     | 16  |     | Allow for 2 no. pans and handwashing facilities, incl. 1 non ambulant  | ✗   |    | ✗   |    | ✗   |  | ✗   |   |   |
|                            | WC (superloo)        | 4   |     |  |     |    |     |    |     |  |     |   |   |
|                            | Accessible WC        | 6   |     | Sport England ref with baby change   | ✓   | 8  | ✗   |    | ✗   |  | ✗   |   | The size of the accessible WCs are in line with Building Regulations Part T (2024).<br>There was one accessible WC at the previous Dews Lane facility, however  |
|                            | Viewing Quarter Deck |     | 124 |  | ✓   | 45 | ✓   | 50 | ✗   |  | ✗   |   |   |
|                            | Main deck north      |     | 139 |  | ✗   |    | ✓   | 49 | ✗   |  | ✗   |   |   |
|                            | Listening Deck       |     | 80  | A place for people to be, including neurodivergent users, families feeding babies, older people and those with sensory processing needs. | ✗   |    | ✗   |    | ✗   |  | ✗   |   | A listening deck is proposed to provide a quiet area for visitors who have SEN requirements such as autism or sensory needs. It can also be used for activities that require an element of privacy, including baby feeding.<br>The previous Dews Lane facility did not provide a listening deck.  |
|                            | Plant                | 11  |     |  | ✗   |    | ✗   |    | ✗   |  | ✗   |   | This is a very large site with development quite spread out. Several plant rooms are therefore required due to the distance between each building. A plant room is also a requirement of a modern building as it houses equipment that keeps a building's system running.<br>The previous Dews Lane facility did not contain a plant room.  |
|                            | Net area             | 342 | 343 |  |     | 95 |     |    |     |  |     | 0 |   |
|                            | Partitions           | 31  |     |  | n/a |    | n/a |    | n/a |  | n/a |   |   |
|                            | Stair                | 76  |     |  | ✗   |    | ✗   |    | ✗   |  | ✗   |   |   |
|                            | Lift A               | 4   |     |  | ✗   |    | ✗   |    | ✗   |  | ✗   |   | Lift A can accommodate two carers and a wheelchair user.<br>The previous Dews Lane facility was ground floor level only, so did not require a lift.<br>As per London Plan 2021 3.12.8 Policy D5 states "Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. "   |
|                            | Circulation          | 6   |     |  |     |    |     |    |     |  |     |   |   |
|                            | Circulation          | 23  |     |  | n/a |    | n/a |    | n/a |  | n/a |   |   |
| Gross area (North Quarter) |                      | 482 | 343 |  |     | 95 |     |    |     |  |     | 0 |   |

|                           |                                       |    |    |                                   |   |     |   |  |   |  |   |  |  |
|---------------------------|---------------------------------------|----|----|-----------------------------------|---|-----|---|--|---|--|---|--|--|
| First floor south quarter | Accessible cabin with shower room (1) | 26 |    | Bedroom = 19m2<br>Bathroom = 7m2  | ✖ |     | ✖ |  | ✖ |  | ✖ |  | <p>The layout is larger to comply with ADM M4(2) 2.25 to ensure a clear access zone of minimum 750mm is achievable to both sides and the foot of the bed. A 1500x1500mm turning circle is also required.</p> <p>The bathroom is sized at 7m2 / 10m2 to accommodate an accessible shower and WC. As per ADM 4.24, Unless there are compelling reasons for not doing so, there should be at least as many en-suite shower rooms as en-suite bathrooms, as mobility-impaired people may find it easier to use a shower than a bath.</p> <p>Given the size of the site and the number of visitors proposed to use the site, a total of two accessible bedrooms are required. This is in line with Approved Document M 4.24 which states that at least one wheelchair-accessible bedroom should be provided for every 20 bedrooms or part thereof.</p> <p>If not in use by those with accessibility needs, then the bedrooms could also be used by health-care professionals who are on site to assist visitors, to ensure that they have a good night's sleep, rather than being located within the main sleep zone.</p> <p>The previous Dews Lane facility did not have any accessible bedrooms, which meant that any visitors or staff with accessibility requirements</p> |
|                           | Accessible cabin with shower room (2) | 29 |    | Bedroom = 19m2<br>Bathroom = 10m2 | ✖ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (3)   | 15 |    | Bedroom = 14m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (4)   | 15 |    | Bedroom = 14m2<br>Bathroom = 3m2  | ✓ | 157 | ✖ |  | ✖ |  | ✖ |  | <p>The size of the cabins is dictated by:<br/>London Plan Policy D6</p> <ul style="list-style-type: none"> <li>•In order to provide one bedspace, a single bedroom has a floor area of at least 7.5m2 and is at least 2.15m wide</li> <li>•In order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m2</li> </ul> <p>Technical Housing Standards - Nationally Described Space Standard (March 2015)</p> <ul style="list-style-type: none"> <li>•One double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide</li> </ul> <p>Seasonal accommodation - general notes:<br/>3 people per caravan x 4 caravans= 12 cabins<br/>One WC and shower per caravan.<br/>No accessible rooms. Existing facilities at seasonal accommodation share WC and shower facilities with others. *client to provide justification for unsuitability of this.</p>   |
|                           | Standard cabin with shower room (5)   | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (6)   | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (7)   | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (8)   | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (9)   | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (10)  | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (11)  | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Standard cabin with shower room (12)  | 15 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  | <p>The provision of 12 standard bedrooms is a like-for-like replacement of the previous Dews Lane facility. These will be used primarily by seasonal staff.</p> <p>The size of the standard bedrooms will be larger than those at the previous Dews Lane facility, in line with modern building regulation requirements.</p> <p>The previous Dews Lane facility had to split bedrooms by gender. The proposed facility provides greater flexibility so that the bedrooms can</p> <p>Current accommodation allows for 4 no. kitchen/living/dining spaces across all bedrooms. Consolidating the accommodation has increased and separated each of these functions, to allow for all staff to congregate together, but also occupy different spaces if desired.</p>  |
|                           | Standard cabin with shower room (13)  | 16 |    | Bedroom = 12m2<br>Bathroom = 3m2  | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Galley                                | 11 |    |                                   | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Dining                                | 23 |    |                                   | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Lounge room                           | 29 |    |                                   | ✓ |     | ✖ |  | ✖ |  | ✖ |  |  |
|                           | Accessible visitor WC                 | 5  |    |                                   | ✖ |     | ✖ |  | ✖ |  | ✖ |  | <p>A separate galley, dining room and lounge room are required for the seasonal staff who are staying at the site.</p> <p>The dining room in particular will need to be able to hold up to 15 members of staff at a time (including instructors, health-care professionals and field-study members). This is likely to be the worst-case scenario in terms of number of staff using the facilities.</p> <p>The size of the accessible WCs are in line with Building Regulations Part T (2024).</p> <p>An accessible visitor WC is required to ensure that anyone with accessibility requirements who is visiting the staff accommodation area can use a WC which is close by, rather than travelling to another part of the site or use one of the standard WCs in one of the staff bedrooms.</p> <p>There was one accessible WC at the previous Dews Lane facility, however the size of the cubicle did not meet Building Regulations. This was also not specifically allocated for visitors.</p>   |
|                           | Plant room                            | 17 |    |                                   | ✖ |     | ✖ |  | ✖ |  | ✖ |  | <p>This is a very large site with development quite spread out. Several plant rooms are therefore required due to the distance between each building. A plant room is also a requirement of a modern building as it houses equipment that keeps a building's system running.</p> <p>The previous Dews Lane facility did not contain a plant room.</p>  |
|                           | Gangway                               |    | 21 |                                   | ✖ |     | ✖ |  | ✖ |  | ✖ |  | <p>The gangway is an external break-out space which will be accessed by seasonal staff only. It provides an area away from visitors staying at the wider site.</p> <p>The previous Dews Lane facility did not include a gangway.</p>   |
|                           | Fore Deck                             |    | 73 |                                   |   |     |   |  |   |  |   |  | <p>The fore deck will provide sheltered access to other areas of the site.</p>   |

|  |   |      |     |  |     |     |     |     |     |  |     |  |
|--|---|------|-----|--|-----|-----|-----|-----|-----|--|-----|--|
|  | Net area                                    | 306  | 94  |  |     | 323 |     |     |     |  |     |  |
|  | Partitions                                  | 32   |     |  | n/a |     | n/a | n/a | n/a |  | n/a |  |
|  | Stair and Lift                              | 27   |     |  | ✗   |     | ✗   | ✗   | ✗   |  | ✗   |  |
|  | Circulation                                 | 62   |     |  | n/a |     | n/a | n/a | n/a |  | n/a |  |
|  | Gross area                                  | 427  | 94  |  |     | 323 |     | 0   |     |  | 0   |  |
|  | Gross area: Operations zone (main building) | 2029 | 591 |  |     | 652 |     | 70  |     |  | 0   |  |

| 3 SAFETY ZONE |                                 |     |    |   |     |      |     |     |     |   |     |  |
|---------------|---------------------------------|-----|----|---|-----|------|-----|-----|-----|---|-----|--|
| Safety zone   | Energy centre                   | 69  |    | Central site plant room to control, maintain and observe the sustainable equipment throughout the site.   | ✗   |      | ✗   |     | ✗   |   | ✗   | The energy centre is required to support the running and operation of the facility. It will also help meet the site's sustainability goals including, battery storage, management of solar panels and the installation of water source heat pumps.<br>The previous Dews Lane facility did not contain an energy centre.  |
|               | High voltage switch room        | 6   |    |   | ✗   |      | ✗   |     | ✗   |   | ✗   |  |
|               | Low voltage switch room         | 6   |    |   | ✗   |      | ✗   |     | ✗   |   | ✗   |  |
|               | Plant Room                      | 41  |    | Required for the water source heat pump   | ✗   |      | ✗   |     | ✗   |   | ✗   |  |
|               | Transformer (existing)          | 46  | 0  | Contained internally for safeguarding and fire safety   | n/a |      | n/a |     | n/a |   | n/a | The transformer is already located on the site and is required to ensure that the site can operate sufficiently with electricity.<br>The previous Dews Lane facility did not contain a transformer.  |
|               | Safety equipment storage        | 380 |    | Storage shed for wetsuits, buoyancy aids, and safety boats. Direct access to water.   | ✓   | 1495 | ✓   | 235 | ✓   |   | ✗   | The propose looks to consolidate the container storage at Dews Lane into a single space for greater efficiency.<br><br>A secure equipment store is necessary as there will be safety equipment and activity equipment that will need to be stored on site. A secure store means that the equipment will not be tampered with, damaged or stolen.<br>The previous Dews Lane facility did have a Safety Equipment Storage Yard, but this was a very informal area.   |
|               | Safety equipment storage (yard) |     | 74 | To allow students to gather while putting on equipment, space to wash and dry equipment after use.  | ✓   |      | ✓   |     | ✓   |   | ✗   | A safety equipment storage yard is required to store any equipment which cannot fit into the storage areas or which may need to hung up and dried outside such as buoyancy aids and wetsuits. This area must be secure so that equipment is not tampered with, damaged or stolen.<br>The previous Dews Lane facility did contain a safety equipment storage yard.  |
|               | Accessible WC                   | 7   |    | Allow for changing bench within WC. Safety equip. store. In line with the Equality Act, accessible WC provision to be provided to staff and volunteers. Would otherwise be significant distance from main building / operations zone. | ✗   |      | ✗   |     | ✗   |   | ✗   | In line with the Equality Act, accessible WC provision to be provided to staff and volunteers. Would otherwise be significant distance from main building / operations zone.<br>The size of the accessible WCs are in line with Building Regulations Part T (2024).<br>There was one accessible WC at the previous Dews Lane facility, however the size of the cubicle did not meet Building Regulations and did not provide any accessible shower or changing facilities.<br>An accessible WC is specifically required in this location to ensure that children who have accessibility needs and need to use a WC quickly can do so. It is also required for adults and operational staff so that they are not far away from the activities area for a long period of time. |
|               | "Pantry" Kitchen & mess         | 8   |    | Safety equip. store   | ✗   |      | ✗   |     | ✗   | ✗ | ✗   | The pantry kitchen and mess is required to prepare light refreshments for visitors. It will be an adults-only area.  |
|               | Boat store                      | 83  |    | For safety boats  | ✓   | 51   | ✓   | 75  | ✓   |   | ✗   | 75<br>6 no. containers - inadequate storage solution<br><br>The boat store is required for the storage of boats which will be used by visitors and instructors.<br>The existing Dews Lane facility did have a boat storage for a total of 6 boats. This area has been consolidated as part of the proposed development to provide more efficient and secure storage. This area must be secure so that equipment is not tampered with, damaged or stolen.   |

|                             |      |     |   |     |      |     |     |     |     |     |  |   |
|-----------------------------|------|-----|---|-----|------|-----|-----|-----|-----|-----|--|---|
| Workshop and repairs        | 514  |     | No student access   | ✓   | 499  | ✓   | ✓   | ✓   |     | ✗   |  | The workshop and repairs room and yard is required for essential maintenance. Both will be used by operational staff only. The previous Dews Lane facility did contain an area which incorporated the pantry kitchen and mess, workshop and repairs room and workshop and repairs yard.                       |
| Workshop and repairs (yard) |      | 318 | No student access. Partially covered.   | ✓   |      | ✓   | ✓   | ✓   |     | ✗   |  | The workshop and repairs room and yard is required for essential maintenance. Both will be used by operational staff only. The previous Dews Lane facility did contain an area which incorporated the pantry kitchen and mess, workshop and repairs room and workshop and repairs yard.                       |
| "Pantry" Kitchen & mess     | 6    |     | Workshop staff use.   | ✓   |      | ✗   | ✗   | ✗   |     | ✗   |  |   |
| Accessible WC               | 6    |     | Allow for changing bench within WC. Safety equip. store. In line with the Equality Act, accessible WC provision to be provided to staff and volunteers. Would otherwise be significant distance from main building / operations zone. | ✗   |      | ✗   | ✗   | ✗   |     | ✗   |  | In line with the Equality Act, accessible WC provision to be provided to staff and volunteers. Would otherwise be significant distance from main building / operations zone.  |
| Horticultural Store         | 19   |     |   | ✓   |      | ✓   | ✓   | ✓   |     | ✗   |  | The horticultural store is required to store equipment for ground maintenance and horticulture. Equipment with electric engines will also be stored here. This area must be secure so that equipment is not tampered with, damaged or stolen. The previous Dews Lane facility did not contain a ground store. |
| Net area                    | 1191 | 392 |   |     | 2045 |     |     |     |     |     |  |   |
| Partitions                  | 23   | 0   | n/a   | n/a |      | n/a | n/a | n/a | n/a | n/a |  |   |
| Circulation                 | 11   | 0   | ✗   | ✗   |      | ✗   | ✗   | ✗   |     | ✗   |  |   |
| Gross area: Safety zone     | 1225 | 392 |   |     | 2045 |     |     |     | 0   |     |  |   |

| 4 ANGLERS' FACILITIES |    |    |  |     |   |     |     |     |     |     |  |  |
|-----------------------|----|----|--|-----|---|-----|-----|-----|-----|-----|--|--|
| Handwash              |    | 2  | By the Main Gate                             | ✗   |   | ✗   |     | ✗   |     | ✗   |  | For handwashing and to sterilise fishing equipment   |
| Tea Point             | 5  |    | By the Main Gate                             | ✗   |   | ✗   |     | ✗   |     | ✗   |  |  |
| Accessible WC         | 2  |    | By the Main Gate                             | ✗   |   | ✗   |     | ✗   |     | ✗   |  | The size of the accessible WCs are in line with Building Regulations Part T (2024). A separate WC for anglers, away from the operation, safety and camp zones must be provided for child protection and safeguarding purposes. |
| Store                 | 2  |    | By the Main Gate                             |     |   |     |     |     |     |     |  | For angling equipment  |
| Walkway               |    | 12 | By the Main Gate                             |     |   |     |     |     |     |     |  | To provide shelter   |
| Handwash              |    | 2  | By the existing Broadwater Sailing Club site | ✗   |   | ✗   |     | ✗   |     | ✗   |  | For handwashing and to sterilise fishing equipment   |
| Tea Point             | 5  |    | By the existing Broadwater Sailing Club site | ✗   |   | ✗   |     | ✗   |     | ✗   |  |  |
| Accessible WC         | 2  |    | By the existing Broadwater Sailing Club site | ✗   |   | ✗   |     | ✗   |     | ✗   |  | The size of the accessible WCs are in line with Building Regulations Part T (2024). A separate WC for anglers, away from the operation, safety and camp zones must be provided for child protection and safeguarding purposes. |
| Store                 | 2  |    | By the existing Broadwater Sailing Club site | ✗   |   | ✗   |     | ✗   |     | ✗   |  | For angling equipment  |
| Walkway               |    | 12 | By the existing Broadwater Sailing Club site |     |   |     |     |     |     |     |  | To provide shelter   |
| Net area              | 18 | 28 |  |     | 0 |     |     |     |     |     |  |  |
| Partitions            | 6  | 0  | n/a  | n/a |   | n/a | n/a | n/a | n/a | n/a |  |  |
| Gross area: Anglers'  | 24 | 28 |  |     | 0 |     |     |     | 0   |     |  |  |

## Appendix 4 – Copies of former HOAC facility school programmes

## Activity Programme

| 9.15am - 11.45am |   | LUNCH | 12.15pm - 2.45pm |            |
|------------------|---|-------|------------------|------------|
| 1                | Web<br>Swamp<br>Nightline 2<br>Treasure Quest |       | Instructor       | Instructor |
| 2                |   |       |                  |            |
| 3                |   |       |                  |            |
| 4                |   |       |                  |            |
| 5                | High Ropes                                    |       | Instructor       | Instructor |
| 6                |   |       |                  |            |
| 7                |   |       |                  |            |
| 8                | Raft Building                                 |       | Instructor       | Instructor |
| 9                |   |       |                  |            |
| 10               |   |       |                  |            |
| 11               |   |       | Instructor       | Instructor |
| 12               |   |       |                  |            |
| 13               |   |       |                  |            |
| 14               |   |       | Instructor       | Instructor |
| 15               |   |       |                  |            |
| 16               | Archery & Giant Swing                         |       | Instructor       | Instructor |
| 17               |   |       |                  |            |
| 18               |   |       |                  |            |
| 18               | High Ropes                                    |       | Instructor       | Instructor |
| 19               |   |       |                  |            |

**Maximum of 190 participants may attend per visit**

**Groups 1 - 15 - Swimmers only - must be able to swim 10m (max 150 participants)**

**Groups 16 - 19 - Non Swimmers only (max 40 participants)**

**Should the numbers of participants for either swimmers or non-swimmers exceed the maximum number of participants shown in bracket please advise the centre immediately.**

# Activity Programme

| 9.30am - 11.30pm |                       |            | 12pm - 2pm            |            |
|------------------|-----------------------|------------|-----------------------|------------|
| 1                | Orienteering          |            | Web Swamp Nightline 1 | Instructor |
| 2                |                       |            |                       | Instructor |
| 3                |                       |            |                       | Instructor |
| 4                |                       |            | Web Swamp Nightline 2 | Instructor |
| 5                |                       |            |                       | Instructor |
| 6                | Web Swamp Nightline 1 |            | Orienteering          | Instructor |
| 7                |                       |            |                       |            |
| 8                |                       |            |                       | Instructor |
| 9                | Web Swamp Nightline 2 |            |                       | Instructor |
| 10               |                       | Instructor |                       |            |

All participants must be aged 7 or above

## Wednesday 10am - 11am

8 Students

|                   |                 |
|-------------------|-----------------|
| 11 September 2019 | No Availability |
| 18 September 2019 | 1 Orienteer SR  |
| 25 September 2019 | 1 Swamp 2 SR    |
| 02 October 2019   | 1 Web 2 SR      |
| 09 October 2019   | 1 N.Line 2 SR   |
| 16 October 2019   | 1 *TM/MS SR     |

## Thursday 2pm - 3pm

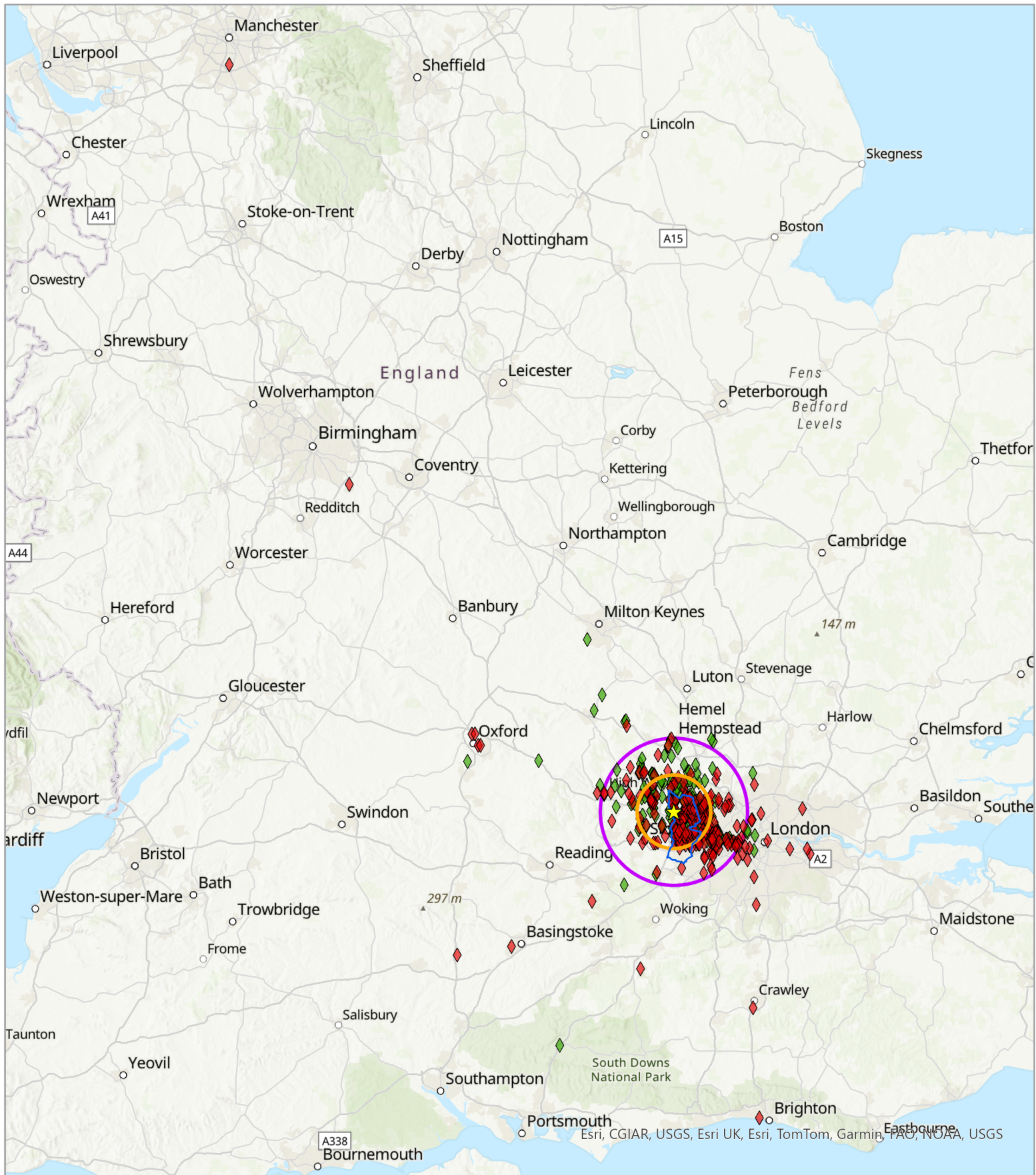
7 Students

|                   |                 |
|-------------------|-----------------|
| 12 September 2019 | No Availability |
| 19 September 2019 | 1 Orienteer SR  |
| 26 September 2019 | 1 Swamp 2 SR    |
| 03 October 2019   | 1 Web 2 SR      |
| 10 October 2019   | 1 N.Line 2 SR   |
| 17 October 2019   | 1 *TM/MS SR     |

\* Tyre Mania & Minesweeper



## Appendix 5 – Maps of former HOAC facility users (2015)



- ★ Existing HOAC Site
- ♦ Schools and Groups
- ♦ Individual Memberships
- London Borough of Hillingdon
- 10km buffer ASA
- 20km buffer

**HOAC Users**

0 15 30 Kilometers



April 2025

Created by: Quod

Scale: 1:1,370,000 @ A4



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